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D.C. Office of Planning

February 11, 2020

(Sent via email to plandc@dc.gov and upload to resolutions.anc.dc.gov)

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Re: Comments on the Draft Comprehensive Plan Update

At its duly noticed regular public meeting on February 11, 2020, Advisory Neighborhood Commission 6B (ANC 6B) considered the above-referenced matter. With a quorum of at least six commissioners present, after division of the question and through a series of motions, ANC 6B approved the following comments, with votes noted on each page header.

ANC 6B has prepared comments on several parts of the Comprehensive Plan, which are attached. Where possible, we identified specific provisions of the Plan that should be amended; however, we recognize that such efforts will always be incomplete and encourage the Office of Planning to incorporate the comments as broadly as possible throughout all relevant parts of the Plan. In particular, we encourage the Office of Planning to consider changes to the Future Land Use Map or Generalized Policy Map that are necessary to implement the comments we make.

In addition to the attached comments, the ANC would like to offer a few general observations about issues related to development that will be guided by the Comprehensive Plan. We ask that the Office of Planning respond to the comments below as it does to the remainder of the ANC's comments.

The District faces enormous challenges right now, particularly around affordable housing. Those challenges result largely from the increased number of residents in the District and on Capitol Hill. We welcome our new neighbors. We embrace the opportunities associated with the District becoming a more attractive place to live and work. We understand that our neighborhood is particularly attractive to new residents because of its existing character and charm, proximity to the central business districts, and easy access to public transportation, including four Metro stops. We also understand that the only way to address the current and expected future shortfalls in housing is to add additional housing to the District, including in our neighborhood. Therefore, we support the District's vision to add 3200 housing units to the Capitol Hill Planning Area by 2025, including at least 1400 additional affordable units.

Importantly, we understand that there are costs to doing nothing. The opportunity costs to not acting are significant: the status quo is unacceptable and will only worsen if housing affordability is not addressed.

Increased density presents challenges, however. From the District government, it requires increased investments in housing and related infrastructure, including transit, recreational, service, and commercial opportunities for existing and new residents. From members of the community represented by this ANC, it requires conversations and careful work to add density to our established neighborhoods without destroying those aspects of the neighborhoods that make them attractive to begin with.

From both the District government and the community, it requires a level of trust. The District government must trust that members of our community are committed to addressing the challenges of affordable housing, including adding a significant number of new households to our neighborhoods. In turn, members of the community must trust that the District is attempting to do the right thing and will treat residents—existing and new—fairly and respectfully.

Unfortunately, there are examples of how the District government has failed to uphold that trust, particularly with respect to the Hill East Waterfront, which extends from Barney Circle to Benning Road. For example, the District government has failed to implement the codified Master Plan for Reservation 13 and has often failed to communicate with the surrounding community regarding its plans for this site. Reservation 13 should be developed as an important addition to the Hill East Waterfront, providing new and necessary housing, service, commercial, and recreational opportunities. Instead, some parts of the District government have used Reservation 13 to attract Amazon or the Redskins. Those attempts are clearly contrary to the Master Plan. They have been largely done in secret, without consultation with the surrounding neighbors. Furthermore, significant changes to the approved developments on Reservation 13 have been made without notice to the community and without accounting for the concessions that had been previously granted to the chosen developers. A similar pattern appears to be developing with respect to the RFK Stadium site in the northern portion of the Hill East Waterfront.

The District government's approach to all parts of the Hill East Waterfront has incurred enormous opportunity costs to preserve the chance that an NFL team or a major corporation will choose to move to the Hill East Waterfront. Incurring such costs could be an attractive option for cities without enormous affordable housing challenges. Or it could be a necessary option for cities without economic opportunities. But it is neither an attractive nor necessary option for the District. Instead, by failing to act promptly to redevelop the entire Hill East Waterfront, the District has missed opportunities to expand housing, commercial, and recreational opportunities for, and provide important services to, neighbors and residents from across the District.

Finally, a general note regarding the Plan itself and recent submissions by the Capitol Hill Village. First, we recommend that the Office of Planning reduce the amount commentary about the "great progress" that the District has made and instead focus on ensuring that the Comprehensive Plan identifies, to the greatest extent possible, specific goals and accountability for reaching the goals. ANC 6B incorporates their submitted comments into ours, with one change to the Capitol Hill Area Element regarding land use at RFK. The ANC commends the Capitol Hill Village's comments to the Office of Planning and urges OP to amend the Comprehensive Plan to better account for the important role played by older members of our community, and the needs that will need to be met so that they may continue to play that role in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Ready".

Brian Ready
Chair, ANC 6B

CC: Tyler Williams, Ward 6 MOCR
Andrea Limauro, Ward 6 Senior Community Planner, Office of Planning
Charles Allen, Ward 6 DC Councilmember.

ANC 6B Comment:

ANC 6B recognizes the acute need to expand public, affordable, and market-rate housing opportunities. Such expansion must occur in a way that slows or halts the displacement caused by rapidly increasing housing prices and allow members of the community at all income levels to remain in the community as they age. Changes should be made to Comprehensive Plan to ensure that the promise of affordability is made real for households most vulnerable to displacement.

The ANC recognizes that change must occur because the status quo does not address these important needs. What's more, we recognize that those changes must account not only for the community as it is today, but as it will evolve over the next decades as additional people move into the District for economic, social, and recreational purposes. We expect that demand for housing within our ANC and across Capitol Hill will remain high. Our ANC's experience over the last several years has shown that even in mature neighborhoods, substantial progress can be made in increasing the house supply without losing the essential character of the neighborhood.

The ANC supports the District's vision for adding 3200 housing units to the Capitol Hill Planning Area by 2025, including at least 1400 affordable units. The ANC believes that it is important that those units--both market-rate and affordable--be integrated in mixed-income developments across Capitol Hill. The District should not let developers further segregate our community by placing IZ or other required affordable units, including public housing, in separate buildings or blocks. Furthermore, the District should explore direct financing and other innovative financing arrangements to promote all levels of housing affordability. And the District should closely examine all existing or proposed exceptions to zoning rules (including all zoning overlays) to ensure that they are updated to incorporate current IZ or other affordability requirements.

The District should also study how to best mitigate four recurring challenges. First, it should develop programs to ensure that families who have lived on Capitol Hill for generations are not displaced by increased property taxes or other costs of ownership, or when family homes are inherited by younger generations. Second, older neighbors who wish to remain in the community must have access to affordable housing choices (low, moderate, and middle-income, in addition to market-rate) that feature universal design and common spaces, and the associated neighborhood infrastructure, including transit and recreational opportunities. Third, the District should examine why existing property owners and developers do not add 1- or 2-bedroom accessory units (such as English basements or alley lots) and take steps to eliminate those barriers. Fourth, the District should continue to take steps to minimize the elimination of family-sized housing units (3-4 bedrooms).

With respect to public housing across the District and within the ANC, we believe that it is important that any improvements made to the existing public housing meet strict criteria: redeveloped or renovated housing should be available in the same-sized units and affordability levels and existing residents must have access to continuous housing and the opportunity to return, remaining together in their original communities. Additional housing units that are added as a result of improvements or redevelopment should include both affordable and market-rate units.

Finally, we note that many parts of the plan call for "affordable" housing without specifying the level of affordability. Rather than revising all of them, we recommend placing language in the "Callout Box" in the Housing Element defining affordability that states that the terms "affordable" and "affordability" as used throughout the plan refer to housing that is affordable to low-income households according to the proportions established [in Figure 5.3.]

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)

504.7 Policy H-1.2.2: Production Targets Producing Affordable Housing

One-third of the new housing built in the city over the next 20 years, or approximately 29,000 units, should be affordable to persons earning 80 percent or less of the area wide median family income (AMI) (MFI). Newly produced affordable units should be affordable to households at different levels of income according to the proportions shown in Figure 5.3. The District should also measure median family income specific to the District and work to incorporate that standard into affordable housing opportunities for District residents.

505.12 Policy H-1.3.7 Housing choices to accommodate needs of older neighbors

Identify and promote feasible methods by which older neighbors who wish to remain in the community may have access to affordable housing choices (low, moderate, and middle-income, in addition to market-rate) that feature universal design and common spaces, and the associated neighborhood infrastructure amenable to the needs of older neighbors, including transit and recreational opportunities.

(This paragraph is a proposed inclusion and the paragraph and policy numbering reflect the next available open paragraph in the October 2019 Draft Amendments)

507.1 The development of housing may be hampered by both governmental and nongovernmental constraints. Governmental constraints include lengthy delays in permit processing and plan approval, insufficient coordination among agencies and utilities, zoning regulations which may not reflect contemporary housing trends, and even prohibitions on certain types of housing. Such constraints often serve important public purposes, but sometimes constraints may be merely burdensome, with no discernible public benefit. Non-governmental constraints include the high cost of land and rising interest rates. Although much progress has been made in the last five years in eliminating unnecessary regulatory burdens that serve no discernible public benefit, serious barriers still exist. Fear of these barriers, and their cost, keeps keep some developers from undertaking projects in the city at all, and keep some homeowners from registering their basement units or other rental uses of their property.

NEW Action H-1.5.G: Remove Unnecessary Regulatory Obstacles

Continue to identify and review regulatory impediments to the production of market rate and affordable housing. Remove regulations that are both unnecessary (in that they advance no important public interest) and burdensome, and propose more efficient and effective alternatives for achieving important policy and regulatory goals.

509.9 Policy H-2.1.5: Long-Term Affordability Restrictions

Ensure that affordable housing units that are created or preserved with public financing are protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by federal programs program requirements, affordable units should remain affordable for the life of the building, if. For land disposition and affordable housing tied to zoning relief, affordability should last for the life of the building, with equity and asset build up opportunities provided for ownership units.

NEW Policy H-2.1.8: Redevelopment of Affordable Housing

Subject: Housing Affordability and Accessibility**Elements:** Housing, Land Use, Capitol Hill**ANC Vote:** 10-0-0

As affordable housing reaches the end of its functional life, support the redevelopment of the site to the greatest extent feasible in line with the District's goals and strategies regarding equity and inclusion. Redevelopment should maintain or expand the same number of affordable units, of the same size and affordability level, if feasible. Current residents of affordable units should have the right to return to their units or an equivalent replacement.

1509.11 Policy CH-1.1.10: Public Housing

Rehabilitate and expand public housing projects on Capitol Hill, ensuring that any units that are removed are replaced by new public housing units within the Community that maintain the same size and affordability level. Current residents must have the right to return to their units or an equivalent replacement. Where feasible, rehabilitation projects should provide home ownership opportunities for public housing residents. Additional density—beyond existing units—should include subsidized, affordable, and market-rate units.

1512.14 Action CH-2.2.D: Potomac Gardens

Pursue redevelopment of Potomac Gardens as a mixed-income development, including an equivalent number of affordable and family units and additional market rate units. Overall densities should not be significantly incompatible with adjacent uses. Management of the property must avoid the long-term displacement of existing residents and rehabilitation should, to the extent feasible, use a “build-first” approach to minimize temporary disruption and displacement.

NEW Accessory dwelling units and alley lots are other forms of infill development that can provide opportunities for addressing affordability. Accessory dwelling units and smaller houses built on alley lots can provide opportunities to age in place, purchase a first home, or help pay a mortgage.

(This paragraph reflects changes to the paragraph between 307.4 and 307.5)

309.8 Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply including affordable units and expand neighborhood commerce with parallel goals to respect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, although all neighborhoods have a role in helping to meet broader District-wide needs such as affordable housing, public facilities, etc. Experience has shown that even in mature neighborhoods, substantial progress can be made in increasing the housing supply and expanding neighborhood commerce without losing the essential character of our neighborhoods.

309.14 Policy LU-2.1.9 Alterations to Rowhouses and Apartments

Generally discourage alterations to buildings that result in a loss of family-sized units.

309.14

310.8 Policy LU-2.2.7: Alley Use

Discourage the conversion of alleys to private yards or developable land when the alleys are part of the historic fabric of the neighborhood and would otherwise continue to perform their intended functions, such as access to rear garages and service areas for trash collection.

Subject: Housing Affordability and Accessibility

Elements: Housing, Land Use, Capitol Hill

ANC Vote: 10-0-0

Support the greening of residential alleys where feasible to enhance sustainability and stormwater management. Encourage residential development in alleys where appropriate. Encourage potential activation of commercial alleys in business districts through art, programming, and events, where not in conflict with the intended function of the alley network.310.8

- 319.18a Policy LU-2.1.14: Planned Unit Developments in Neighborhood Commercial Corridors
Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits including housing, affordable housing, and affordable commercial space. Community benefits from PUDs should focus on providing additional affordable housing units. 309.18a

ANC 6B Comment:

ANC 6B endorses the proposed changes to the Generalized Policy and Future Land Use Maps, with the comments or clarifications below.

- With respect to the proposed change to the General Policy Map along Pennsylvania Avenue (Map Amendment 9949), the ANC supports pedestrian-focused redevelopment that preserves the historic structures and equity of long-standing communities.
- The ANC recommends that the Future Land Use Map and the General Policy Map be amended to reflect recommendations contained elsewhere in the ANC submission with respect to:
 - The Hill East Waterfront (from Barney Circle to Benning Road, inclusive of the old RFK Stadium site)
 - 15th Street Commercial Corridor
 - 1333 M Street SE Triangle (designated as Map Amendment 9925)
 - Southeast Boulevard

ANC 6B Comment:

ANC 6B strongly supports the redevelopment of the Hill East Waterfront, extending from Benning Road in the north to Barney Circle in the south, comprising both Reservation 13 and adjacent properties, and the site currently occupied by RFK Stadium and its parking lots. The ANC believes that the redevelopment of these properties is crucial to the District's long-term goals of expanding housing, commercial, and recreational opportunities.

The same basic principles underlay our views on both sites. Developments should be integrated into the surrounding neighborhoods, including, where appropriate, extending the existing street grid—a mixture of throughways, parks, and pocket-parks—to the Anacostia River. Development efforts should begin as soon as practicable, and not wait for institutional, “anchor employer”, or professional sports uses. Additional housing, community service, recreational, and commercial opportunities that arise from the redevelopment of the entire Hill East Waterfront should be directed toward serving adjacent neighborhoods and people from across the District, including through significant expansion of affordable and market-rate housing, which should be built in mixed-income buildings.

These principles are largely reflected in the Master Plan for Reservation 13, which was developed in the early 2000s with extensive community input and codified by the DC Council. We echo the comments that this ANC submitted in 2017 with respect to Reservation 13, which can be summarized as: “Enact the Master Plan, already.” To that end, we oppose the amendment offered by the Office of Planning that suggests that Reservation 13 should be reserved for an anchor employer or institutional tenant. We also want to clarify that we oppose the transformation of the Park Road envisioned by the Reservation 13 Master Plan into any sort of commuter bypass; it should remain, as originally envisioned, a local street that accommodates cyclists and pedestrians, very low-speed traffic, and promotes easy access to the Anacostia River. We understand that the District's plans for the DC Jail are in flux; if it is relocated, then development south of Massachusetts Avenue should reflect the designs and priorities of the remainder of Reservation 13.

With respect to the northern two-thirds of the Hill East Waterfront (comprising RFK Stadium and the surrounding land), the ANC supports redevelopment efforts that focus on expanding residential and commercial opportunities on the site, as well as continuing efforts to add important recreational and environmental spaces. A Small Area Plan should be developed and the Future Land Use Map and the Generalized Policy Map should be amended to reflect mixed-used and mixed-income residential and commercial developments, community-focused recreational uses, and environmental restoration.

We oppose any use of any portion of the site for a professional sports franchise or stadium or other venue that would be used infrequently and waste the enormous opportunity the site presents. We believe that the site is large enough that it could support a combination of housing, commercial, community service, and recreational spaces. (In particular, those portions of the site that are inappropriate for housing should be turned into wetlands, additional recreational fields, trails, or a combination of all three.)

Finally, the ANC believes that one of the great distinguishing features of the Hill East Waterfront is the largely natural state along the immediate riverfront; we support developments and redesign that preserve natural waterfront habitats and features as much as possible and avoids creation of artificial boardwalks.

The ANC recommends that the draft Comprehensive Plan, Future Land Use Map, and Generalized Policy Maps be amended to reflect the principles and priorities explained above.

Subject: Triangle between 12th, Water, M St SE.**Element:** Capitol Hill, Lower Anacostia/Near Southeast**ANC Vote:** 9-0-0**ANC 6B Comment:**

ANC 6B fully supports the goals for housing creation laid out in the Mayor's May 10, 2019 Order *Housing Framework for Equity and Growth* and subsequent October 15, 2019 *Housing Equity Report: Creating Goals for Areas of Our City*. The triangle of land bounded by 12th Street SE, Water Street SE, and M Street SE presents a unique opportunity to transform fallow unproductive industrial sites into productive residential and commercial uses.

ANC 6B is steadfastly in support of the change in designation in the future land use map to high density residential and medium density commercial as well as inclusion in the Future Planning Analysis and Resilience Focus policy areas. This designation could allow 2+ million square feet of by-right residential development and could add over 5% of the necessary units to reach the Mayor's target of 36,0000 new units citywide by 2025.

ANC 6B offers the following comments as ways to strengthen the District's commitment to this triangle while providing a framework to maximize potential development and minimize impacts on existing neighborhoods. First, we recommend codifying the need for a Small Area Plan or Urban Design Guidelines as a new action item. These guidelines should focus on a coherent transition to the existing neighborhoods to the north and protecting and enhancing the boathouse uses to the south, while maintaining a distinct identity for this new small neighborhood.

Second, ANC 6B reiterates the technical suggestion to move this land to the Capitol Hill Area Element as impacts of this development will be felt almost exclusively in that area. Further, we recommend to merge this land with the existing Southeast Boulevard Policy Focus Area or, if it stays in the Lower Anacostia and Near Southeast Area Element, to add this land as a new focus area in that element

For over a century, this site polluted the air, ground, and water fenced off from our neighborhood. It's time for this land to return to the community as homes, green space, recreations areas, and commercial activity. Let's reconnect a new generation of residents to the Anacostia and remove the stain of 1960's highway planning.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)**AW 1910.1** ("...

*Buzzard Point, a traditionally industrial area currently into an emerging mixed-use waterfront neighborhood and the home of the Audi Field soccer stadium.

*Washington Gas Triangle, a historic toxic gas production and storage area. Home to two large office buildings with incompatible surface parking lots and vacant and/or unproductive industrial uses.

NEW**AW 2.7 Washington Gas Triangle**

NEW-2.7.1 Washington Gas Light Company manufactured gas on a large portion of this site for nearly 100 years starting in 1888. The plant was removed in 1986. Through a series of land transfers and subdivisions, only two entities remain as owners of private land in this triangle. Extensive remediation under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act are nearing an end for the two reservations in this square. Washington Gas has developed two medium sized

Subject: Triangle between 12th, Water, M St SE.**Element:** Capitol Hill, Lower Anacostia/Near Southeast**ANC Vote:** 9-0-0

office buildings, known as Maritime Plaza I and II, at the northwest corner of this site with extensive surface parking lots.

- NEW Policy AW-2.7.1: Washington Gas Triangle Land Uses
This triangle presents a unique opportunity to add high density uses in the District. Any use should prioritize affordable housing, accessible connections to the waterfront, and environmental features befitting its location. Reservation 296 and the portion of Reservation 343D above Water St SE should be developed as public parks.
- NEW Policy AW-2.7.2: Transportation Connections
Development should maximize pedestrian, cyclist, and motorist connectivity to the west via the Anacostia River Trail and M, N, and O Streets, as well as pedestrian and cyclist connectivity to the east via the Anacostia Riverwalk Trail and north across the CSX tracks. Motorized connections across the CSX tracks should not exist east of 11th Street SE
- NEW Policy AW 2.7.3: Environmental Stewardship
Owing to the history of use and adjacency to the Anacostia River, developments in this area shall be leaders in environmental design and sustainability. Surface parking lots should not be allowed. Green roofs and solar panels should be incorporated into the building.
- NEW Action AW-2.7.A: Land Use Planning
In conjunction with CH 2.5.B, create and implement a small area plan or urban design guidelines for this triangle, identifying connections to the surrounding neighborhoods and opportunities to add green space in District-owned parcels. Implement any associated zoning map or text amendments these plans including to provisions in waterfront zoning incompatible with modern environmental design and impact mitigation.

(The above paragraphs are proposed insertions. We believe they should go into the Capitol Hill Area element and the planning areas changed. However, we numbered the above insertions where we believe they should go into the Lower Anacostia and Lower Southwest Area Element)

ANC 6B Comment:

ANC 6B fully supports the goals for housing creation laid out in the Mayor's May 10, 2019 Order *Housing Framework for Equity and Growth* and subsequent October 15, 2019 *Housing Equity Report: Creating Goals for Areas of Our City*. As one prong to bridge the 1,120-unit gap on Affordable Housing in the Capitol Hill Area Element, ANC 6B fully supports the proposed revisions to the Capitol Hill Area Element regarding Southeast Boulevard. There are few areas in close-in neighborhoods to create more city blocks. Southeast Boulevard presents a unique opportunity to help meet the market-rate and committed affordable housing needs of the city and Capitol Hill Planning Area. Further, the project improves access to the Anacostia Waterfront, increases employment opportunities, and creates recreational and community service opportunities.

While recognizing the incredible opportunities presented by Southeast Boulevard, the Comprehensive Plan must also recognize the potential impacts on the existing residents including shifting traffic patterns. Given the geographical and financial realities of the project, ANC 6B encourages OP to include language wherever possible that details necessary mitigation of any use of the land under a new at-grade Southeast Boulevard. These mitigations should at a minimum:

- *Prohibit the storage, repair, or idling of pollutant-emitting automobiles, particularly non-electric buses.

- *Ensure automotive connections to underground space are available only from 11th Street or Barney Circle

- *Promote any new employment opportunities to the surrounding residential area

- *Ensure the design of the facility can support uses other than transportation uses currently envisioned.

The land created by Southeast Boulevard serves as the perfect buffer between the existing moderate density rowhouse neighborhoods to the north and the proposed high-density uses to the south. Given the uncertainties of future ward redistricting and legislative action, ANC 6B recommends the land for Southeast Boulevard be changed in the Future Land Use Map to Medium Density Residential and Low Density Commercial rather than maintaining the existing Production & Technical Employment designation. Further, we recommend this change extend all the way to M Street SE incorporating a small but impactful triangle (Square 1024, Lot 0808) owned by CSX, whose industrial uses are incompatible with the surrounding FLUM designations. We finally recommend extending the land-use change area in the Generalized Policy Map all the way to Barney Circle.

ANC 6B is excited to be an equitable partner in housing production and help lead the creation of new community spaces. We encourage OP to work expeditiously with its partner agencies to move plans forward for Southeast Boulevard.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)**CH 1508.15 Policy CH-1.1.14: Southeast Boulevard**

Recognize the transportation and land use opportunities and impacts associated with the creation of Southeast Boulevard as an at-grade boulevard, serving to better connect Capitol Hill residents to the Anacostia Waterfront via non-motorized crossing of the CSX tracks and by restoring the historic street grid to the north. Add new residential development and public spaces where possible along a newly designed boulevard. Ensure that new pathways will safely serve both pedestrians and cyclists. Future

Subject: Southeast Boulevard Policy Focus Area

Element: Capitol Hill

ANC Vote: 5-2-3 (5 in support, 2 opposed, 3 abstentions)

planning efforts should reflect the importance of affordable housing potential, connecting neighborhoods to the river, and creation of community space.

NEW

Policy CH-2.5.1: Southeast Boulevard Land Uses

Ensure that the Southeast Boulevard and the land uses around it enhance and strengthen the neighborhood fabric and promote safer and greater connectivity between the Capitol Hill neighborhoods and the Anacostia Waterfront. Implement future land uses that reflect community desires for mixed-use development that reflects its position as a transition area between rowhouse zones to the north and high-density uses to the south. Explore opportunities for neighborhood-serving retail.

NEW

Action CH 2.5.B Additional Land Use Planning for Southeast Boulevard

In conjunction with environmental and feasibility studies, complete a Small Area Plan to further refine the preferred options for the creation of Southeast Boulevard. Identify opportunity for community spaces and other public amenities.

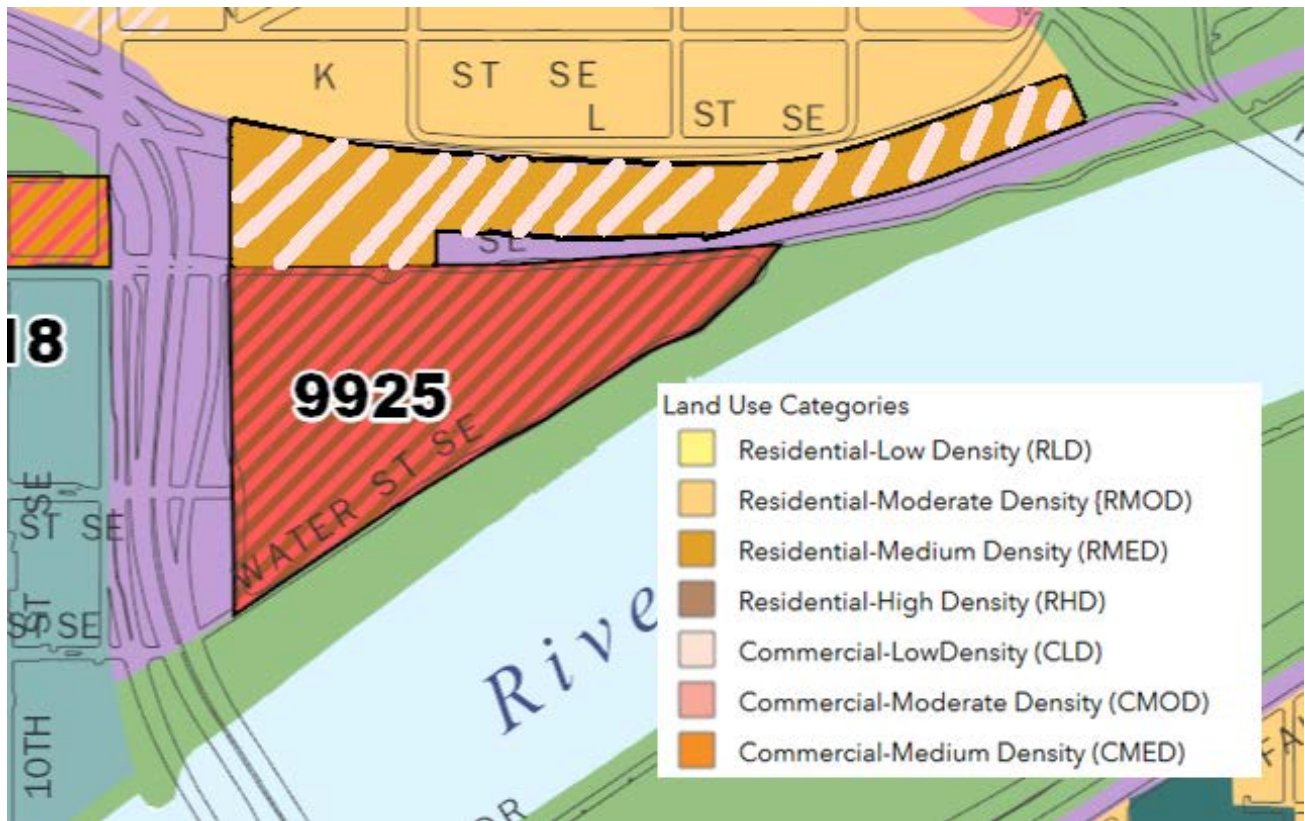
Subject: Southeast Boulevard Policy Focus Area

Element: Capitol Hill

ANC Vote: 5-2-3 (5 in support, 2 opposed, 3 abstentions)

Proposed Changes to Future Land Use Map

Area bounded by bold – Change from Production & Technical Employment to Medium Density Residential and Low Density Commercial. Generally bounded by M Street SE to the South, theoretical 12th Street St SE to the west, the temporary Southeast Boulevard retaining wall to the north, and Barney Circle to the east, excluding the above-ground CSX tracks



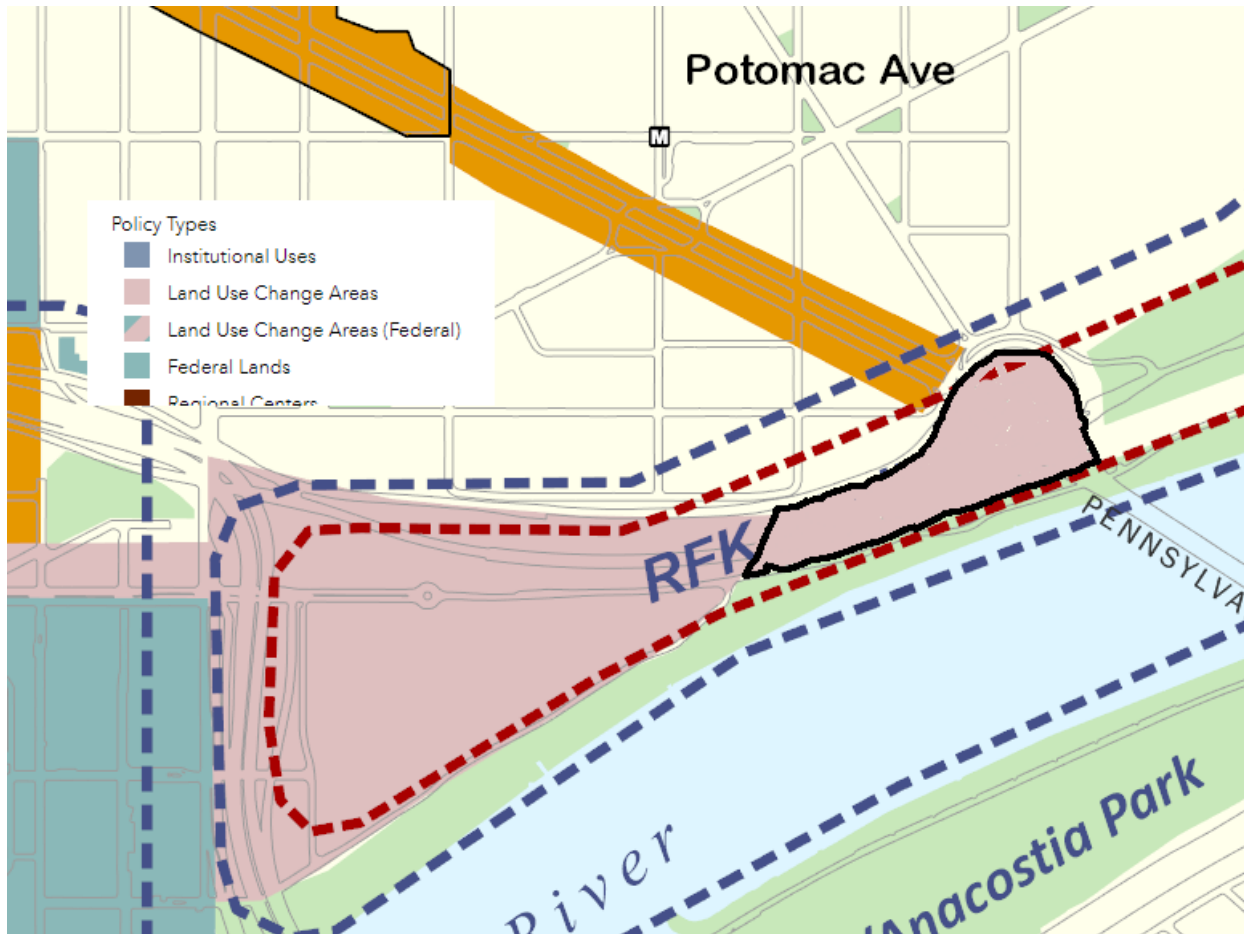
Subject: Southeast Boulevard Policy Focus Area

Element: Capitol Hill

ANC Vote: 5-2-3 (5 in support, 2 opposed, 3 abstentions)

Proposed Changes to Generalized Policy Map

Area bounded by bold – Change from Neighborhood Conservation Area to Land Use Change Area. Generally bounded by M Street SE to the South, the existing land use change near theoretical 15th Street SE to the west, the temporary Southeast Boulevard retaining wall to the north, and Barney Circle to the east.



Subject: 15th Street Commercial Corridor**Element:** Capitol Hill, Future Land Use Map, Generalized Policy Map**ANC Vote:** 9-0-0**ANC 6B Comment:**

15th Street has remained a residential area and residents have a preference for keeping it that way. However, the on-going need for additional housing and residential capacity has led some commissioners to allow the retention of commercial corridors to encourage greater development. On the other hand, there are proposals that ANC 6B has approved that promises to bring nearly 1000 new units of housing stock onto the market in the next three years. In addition, the expected development of Reservation 13 will produce additional increases in the available housing stock near the 15th Street Corridor. The recommended additional language aims to strike a balance between allowing greater residential developments in areas where businesses currently exist or where the geographic layout would minimize concerns about the adverse impact on air and light to neighbors and maintaining the residential characteristic of the 15th Street corridor.

ANC 6B would recommend two areas along this corridor where mixed use zoning may be reasonable and appropriate. These areas are: 1) the commercially zoned area extending North from the intersection of 15th Street & South Carolina Avenue, SE as well the 300 block of 15th Street.

1508.12 Policy CH-1.1.11: 15th Street Commercial District.

Discourage the further expansion of commercial uses along 15th Street SE. This corridor should gradually transition to predominantly residential uses, compatible in density with adjacent row house blocks. As this transition occurs, efforts should be made to retain the existing corner stores and small businesses which serve the community. 1508.12

Subject: Transportation

Element: Transportation

ANC Vote: 10-0-0

ANC 6B Comments:

Our ANC agrees with the stated goal of the Transportation Element, but notes that throughout the document the emphasis is on vehicular transportation. Many of our comments address the issue of pedestrian safety and quality of life of District residents, and in this context we respectfully recommend that the existing final objective of the Goal Statement, “enhances the quality of life for District residents” be inserted immediately following the opening phrase, “Create a safe, sustainable, efficient multi-modal transportation system that . . .”

Among the quality of life issues addressed through our comments are the need for: developing regulations for electric scooters and bicycles; strong statements about procedures for enhancing pedestrian safety; lighting issues, setting standards for private services such as Uber and for electric bicycle/scooter providers; strong enforcement of existing bus idling and also traffic regulations; and assuring continued helicopter service.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)

403.3 The space needs of transportation support facilities—including bus garages, service yards, and motor vehicle inspection facilities—also call for stronger coordination between land use and transportation planning. The Washington Metropolitan Area Transit Authority (WMATA) already has a critical need for additional and improved bus storage and service yards and Comprehensive Plan Transportation Element anticipates a need for greater rail yard space when the Metrorail fleet adds more eight-car trains. The lack of modern bus garages in the District severely impedes better bus service. Further, as new transit lines are developed for the Circulator and DC Streetcar, additional land will be needed for new support facilities. Just as corridor preservation efforts anticipate future needs for transportation facilities, there is a need for land use planning to preserve opportunities for transportation support facilities such as vehicle maintenance and storage. Failure to preserve areas for this use forces facilities to be located at great distances from service areas, increasing costs and limiting vehicle availability in emergencies. In some cases, such as with rail facilities, co-location of vehicle maintenance and storage with operation service is essential. As service needs grow, transportation support facilities are needed to support existing services and future growth across the District. The Washington Metropolitan Area Transit Authority already reports a need for additional bus storage and service yards. As new transit lines are developed, additional land will be needed for new support facilities. Additionally, use the full resources of the city in an aggressive search for suitable heliport sites in non-residential areas to replace two locations that are to be discontinued (National Park Police, Congressional Aviation).

407.18 Policy T-2.1.2: Surface Transit Improvements

Enhance surface transit service by improving scheduling and reliability, providing timed transfers, reducing travel time, providing relief for overcrowding, increasing frequency and service hours, and improving both local access and cross-town connections. Key strategies in support of this policy may include roadway priority treatments including - dedicated transit lanes and Transit Signal Priority, proof of payment systems, moving bus-stop locations beyond the traffic signal whenever possible to facilitate traffic flow, and larger vehicles capable of carrying more riders.

409.14 Action T-2.3.D: Capital Bikeshare and other providers of docked and dockless scooters and bikes Community Partners

Subject: Transportation

Element: Transportation

ANC Vote: 10-0-0

Continue investment in Community Partners Program to reach unemployed, underemployed, and homeless populations with subsidized Capital Bikeshare and other providers of docked and dockless scooters and bikes memberships to address transportation needs.

Add *Action T-2.3.F: Dockless Review Process*

Review existing permitting and licensing policies with regard to their adequacy for assuring safe riding and parking procedures and make adjustments as needed with a view toward assuring public safety.

(ANC 6B Proposes this as a new Action item and, based on the draft comments, believes this is where it should go)

410.8 *Policy T-2.4.4: Sidewalk Obstructions*

Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage. Maintain sidewalk surfaces and elevations so that disabled or older adult pedestrians can safely use them. Explore ways to provide effective enforcement of existing regulations regarding obstruction of sidewalk cafes and bicycle and scooter parking to assure that pedestrians, including older adults and handicapped residents, can safely use them.

410.10 *Action T-2.4.B: Sidewalks*

Install sidewalks on streets throughout the District to improve pedestrian safety, access, and connectivity. Continue to monitor the sidewalk network for needed improvements. Consult with Advisory Neighborhood Commissions (ANCs) and community organizations as plans for sidewalk construction are developed. Coordinate with National Park Service (NPS) to complete local sidewalk networks that overlap with NPS land. All sidewalks, alleys, and streets shall be constructed in conformance with the American with Disabilities Act Accessibility Guidelines

411.17a. *Action T-2.5.D: Analysis of local roads*

Based on the increase in automotive traffic, (1) undertake an analysis about the reasons some streets simply are not suitable for heighten traffic loads, and publication of a new characterization of arterials that illustrates the central elements of the new depictions; and (2) to develop and implement plans to disincentivize and mitigate increased traffic in instances where increased traffic load is not feasible on minor arterials and residential streets.

(This is a proposed new paragraph related to 411.17, to study not just the classification but the reasons why certain roads are used despite the classification)

411.13 New Item related to Capitol Hill 1.1.13 Traffic Management Strategies

In concert with the Capitol Hill element of the Comprehensive Plan, and item 411.12 above, we propose a specific addition to the plan.

1508.14Policy CH-1.1.13: Traffic Management Strategies

Establish traffic management strategies to reduce commuter traffic on East Capitol Street, Independence Avenue, C Street NE, 17th Street SE, and other predominantly residential streets that also function as through-streets. These strategies should include limiting

Subject: Transportation

Element: Transportation

ANC Vote: 10-0-0

additional one-way streets on Capitol Hill (and possibly restoring existing one-way streets to two-way traffic), improving signal timing on Benning Road and Pennsylvania Avenue, and improving pedestrian and bicycle safety. Measures should also be implemented to route through-traffic around residential neighborhoods, and to restrict trucks and heavy vehicles on local streets. Establish traffic management strategies to reduce commuter traffic on East Capitol Street, Independence Avenue, C Street NE, 17th Street SE, and other predominantly residential streets that are increasingly functioning as through-streets.

410.13a Action T-2.5.G: Lighting Review

Review existing lighting on public areas used by pedestrians, and add appropriate lighting to walkways as needed, especially in park areas and in walking areas darkened by summer tree growth.

(This is a proposed new paragraph and action item, which would be appended after 410.13)

415.7 Action T-3.2.C: Curbside Management Techniques

Revise curbside management and on-street parking policies to:

- A. adjust parking pricing to reflect the demand for and value of curb space;
- B. adjust the boundaries for residential parking zones;
- C. establish parking policies that respond to the different parking needs of different types of areas;
- D. expand the times and days for meter parking enforcement in commercial areas;
- E. promote management of parking facilities that serve multiple uses (e.g., commuters, shoppers, recreation, entertainment, churches, special events, etc.);
- F. improve the flexibility and management of parking through mid-block meters, provided that such meters are reasonably spaced and located to accommodate disabled and special needs populations;
- G. preserve, manage, and increase alley space or similar off-street loading space; and
- H. increase enforcement of parking limits, double-parking, bike lane obstruction
- I. other curbside violations, including graduated fines for repeat offenses and towing for violations on key designated arterials
- I. explore increasing curbside access for electric vehicle supply equipment and
- J. Implement and increase residential parking permit fees for housing with multiple residential permits

416.13a Action T.3.I Truck Strike Force

Establishing a strike force to enforce regulations regarding truck traffic on residential streets, especially trucks associated with construction.

(This paragraph is not relevant as CSX has finished construction)

418.2a Policy T-3.5.3 (Intercity Bus Location):

Enforce and implement fines for where Intercity Buses on-street regulations are violated, including prohibitions against extensive idling.

(This is a proposed new paragraph with proposed by ANC 6B and place approximately where it should go)

Subject: Eastern Market Metro Plaza**Element:** Capitol Hill**ANC Vote:** 10-0-0**ANC 6B Comment:**

The ANC recommends updating the action item **1512.10** to further incentivize development of the Eastern Market Metro Plaza. The Plaza is a major transfer point between north-south and east-west bus lines as well as between bus routes and Metro. We acknowledge that the Plaza serves a major role in the transit system for our neighbors to the north, south and east - and that any improvements need to incorporate that transfer role into the design, including easy accessibility/connections between the Metro Plaza and nearby bus stops.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)

1512.12 Prepare and implement a pedestrian-focused urban design and multimodal transit improvement plan for the Eastern Market Metro station entrance, making it a more attractive “town square” and improving the plaza’s ability to serve as a recreational and community gathering space for the neighborhood as well as a major transfer point, including, where appropriate, relocating bus stops to ensure safety and accessibility

ANC 6B Comment:

In the comments submitted in 2017, ANC 6B had proposed adding language to **Paragraph 1508.3** that recognized the importance of adapting to the ongoing climate crisis and therefore allowed for the benefits to the community and District of enhancing energy efficiency to be weighed against the benefits of historic preservation when evaluating the compatibility of features designed to enhance energy efficiency within the Capitol Hill Historic District. Our proposed language was accepted. At the same time, however, the Office of Planning proposed additional language that allowed the benefits to the District and community from the creation of more affordable housing to be weighed against the benefits of historic preservation.

The ANC considered whether there is a workable standard that could accommodate and provide guidance for resolving the tensions that could arise between the District's need for expanded affordable housing and the benefits to the community from a cohesive historic district where changes are only made when they are compatible with the existing neighborhood. We could not articulate such a standard. Therefore, we recommend that the additions to the paragraph related to affordable housing be stricken and that the amendment focus, as originally recommended, on enhancing energy efficiency, perhaps with additional reference to recent HPRB action on the issue.

The ANC welcomes opportunity for further discussion around affordable housing and how to best balance the tension that can arise between housing affordability and historic preservation and suggests that the Office of Planning propose a separate paragraph, either in the Capitol Hill Element or the Housing Element, that can directly address this important issue, hopefully with an articulable standard of how such tension can be reconciled. In particular, the ANC believes that the Office of Planning should clearly define relevant historic preservation standards and avoid using more nebulous terms such as "neighborhood character."

We note that a similar issue arises in the context of **Paragraph 504.14**. Under the proposed revisions, density bonuses should allow for greater flexibility in development standards. We believe this is correct. However, the protection for the historic neighborhood contained in the last sentence should be restated: "Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the applicable historic design criteria." We believe that this threshold of requiring a finding that the density bonus "does not significantly undermine the applicable historic design criteria" provides a flexible enough standard to allow for additional density while protecting historic districts

Finally, the ANC notes that **Paragraph 1005.10**, Policy HP-1.5.6: Consulting the Public on Designation, should be amended to explicitly accord the ANCs' views "great weight", as that term is used with respect to related issues.

ANC 6B Comment:

As expressed in the ANC's comments submitted in 2017, neighbors continue to be concerned about encroachment of non-residential uses in purely or predominantly residential neighborhoods, particularly in blocks immediately adjacent to the Capitol Complex. Such encroachments not only negatively affect the quality of life of our neighbors but also contribute to the city's housing shortage by reducing the supply of available housing.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019 Draft Version)

- 1508.9 Strictly limit and enforce rules against the conversion of housing to non-residential uses in the Capitol Hill Planning Area that reduce the supply of housing and thus housing affordability. This includes the development of private clubs, museums, colleges, universities, dormitories, and other institutional uses within the Capitol Hill Historic District and the inappropriate conversion within the Capitol Hill Historic District of residential properties to nonresidential uses.
- 1513.10 Action 2.3.B: "Maintaining Residential Uses"
Ensure that continued residential use of residential properties surrounding the Capitol is adequately protected in accordance with applicable zoning rules.
(This is a proposed new paragraph with approximate best case location and title)

ANC 6B Comment:

The Capitol Hill and Near Southwest Elements are both largely silent about the development of the 11th Street Bridge Park and its impact on adjacent neighborhoods. Neighbors wholeheartedly support the opening of the Bridge Park, which we believe will bring important recreational opportunities for our neighborhood, Ward 8, and the District as a whole. At the same time, there must be thoughtful efforts to integrate the Bridge Park into the neighborhoods to maximize their connection to the park and capitalize on resulting recreational or retail opportunities.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019 Draft Version)

- 1508.17 *Action CH-1.1.A: Façade Improvements*
Support urban design and façade improvements along H Street, Benning Road, Pennsylvania Avenue, and Barracks Row. Such improvements should preserve and enhance the historic features, scale, and texture of existing structures. Urban design improvements should be applied to 11th Street SE as it approaches the 11th Street Bridge in order to accommodate increased pedestrian traffic toward the 11th Street Bridge Park
- 1508.16a Policy CH-1.1.16: Shuttles to 11th Street Bridge Park
Upon the opening of the 11th Street Bridge Park, provide regular and frequent shuttle bus service from Eastern Market and Potomac Avenue Metrorail stations to the Park.
(This is a proposed addition with appropriate location)
- 1509.6 Policy CH-1.2.6: Improved Park and Recreation Services
Improve parks, playgrounds, and recreational facilities throughout Capitol Hill, with a priority on the Near Northeast neighborhood (between H Street and Florida Avenue). Continue efforts to improve safety, security, and maintenance levels at all parks in the Capitol Hill Planning Area. Optimize the utilization of the many triangle parks throughout Capitol Hill. Explore design features that might include senior fitness equipment, pedestrian paths that serve a wide range of users such as aging adults or persons with limited mobility. Determine if there is a need for additional or expanded recreational spaces such as courts, and fields or additional aquatic centers. Ensure that 11th Street Bridge Park is connected to adjacent neighborhoods.
- 1512.14a Action CH-2.2.E: Shuttle to 11th Street Bridge Park
Implement plans to provide regular and frequent shuttle bus service to accommodate the 11th Street Bridge Park upon its opening.
(This is a new paragraph with approximate location)
- 1900.5 The 2003 Anacostia Waterfront Framework Plan lays out a strategy for improving water quality, restoring habitat, and improving shoreline parks so that the waterfront becomes the centerpiece for new and revitalized communities. A network of trails and paths as part of the Anacostia Riverwalk Trail and bridges such as the completed 11th Street Bridge replacement (together with the 11th Street Bridge Park expected to open in 2022-23) and future new Frederick Douglass Memorial Bridge will help mend the divide that the river has symbolized in Washington. The objective

is not only to connect the east and west shorelines, but to connect the city itself through great parks, public places, and new neighborhoods along a restored river.

- 1900.8 Other planned improvements include a 70-acre public park at Poplar Point, and an Interpretive Nature Center at Kingman Island, and mixed-use development in Buzzard Point. Plans for these areas have been prepared in a broader context, taking into consideration “upriver” sites such as Reservation 13 and Parkside. Throughout the Planning Area and in the adjacent areas of Capitol Hill, Upper Northeast, and Far Northeast/ Southeast, neighborhoods will be better connected to the river by extending streets to the waterfront, adding waterfront promenades, and providing new forms of transportation such as water taxis. The completion of the new 11th Street Bridge (and the future opening of the 11th Street Bridge Park in 2022-23) and the rebuilding of the South Capitol Street/Frederick Douglass Bridge will change the visual profile of the waterfront and make pedestrian and bicycle crossings safer and easier. As the area’s population and development continues to grow, including within flood zones near and along the waterfront, resilient design is critical to riverine and storm surge flooding and projected sea level rise are critical.
- 1908.11 *Policy AW-1.1.10: Upgrading the Bridges*
Upgrade the bridges across the Anacostia River to better manage transportation flows, ensure their safety for decades to come, facilitate pedestrian and bicycle travel across the river, and provide attractive and distinctive civic landmarks. Coordinate planning with the new 11th Street Bridge Park expected to open in 2022-23.
- 1909.3 *Policy AW-1.2.3: Waterfront Sports and Recreation Destinations*
Continue to develop new destinations for sports, recreation, and celebration on or near the Anacostia waterfront, including as part of future development at Buzzard Point and Poplar Point. Leverage resources expected to be made available in connection with the 11th Street Bridge Park upon its opening in 2022-23. Ensure that these destinations are served by adequate and efficient transportation systems and infrastructure.
- 1913.13 *Policy AW-2.3.7: Near Southeast/Capitol Riverfront Historic Identity*
Celebrate the Near Southeast’s history and Create an identity in the Near Southeast that celebrates the area’s history and integrates important historic and cultural resources. These resources include the Navy Yard, local educational, religious, and cultural institutions, and historic landmarks, including industrial and utility buildings like the DC Pumping Station. The 11th Street Bridge Park, which should be opened by 2023, will provide important recreational and leisure opportunities for residents of Wards 6 and 8 and visitors from across the District.
- 1913.13a *Policy AW-2.3-X: Implementation of 11th Street Bridge Park*
Within the context of the Near Southeast/Capitol Riverfront Focus Area, the residential character of adjacent Capitol Hill and Near Southeast neighborhoods should be extended and integrated to the land near and adjacent to the 11th Street Bridge Park, such as the land identified by proposed map amendment 9925 and the Lower 8th neighborhood east of 9th Street, while allowing for appropriate retail and commercial opportunities and public access to the park.
(This is a proposed new paragraph by ANC 6B and the best estimation for its location)

Subject: 11th Street Bridge Park

Element: Capitol Hill

ANC Vote: 10-0-0

1913.13a

Policy AW-2.3-X: Implementation of 11th Street Bridge Park

Within the context of the Near Southeast/Capitol Riverfront Focus Area, the residential character of adjacent Capitol Hill and Near Southeast neighborhoods should be extended and integrated to the land near and adjacent to the 11th Street Bridge Park, such as the land identified by proposed map amendment 9925 and the Lower 8th neighborhood east of 9th Street, while allowing for appropriate retail and commercial opportunities and public access to the park.

(This is a proposed new paragraph with the best estimation for its location).

ANC 6B Comment:

Further revisions to Comprehensive Plan should recognize the important connection between southwest portion of the Capitol Hill Planning Area and adjacent, rapidly growing neighborhoods between South Capitol Street and 11th Street SE, which are discussed in Chapter 19. The changes in those neighborhoods—including increasing residential density, greater employment and retail opportunities, and the resulting changes in traffic patterns—have dramatically increased their influence, in both good and bad ways, over the southwest corner of Capitol Hill. Closer integration between the neighborhoods, especially in ways that make it easier for pedestrians and cyclists to travel, is welcome. Support for and development of parks and recreational opportunities, such as Garfield Park, are welcome. Careful attention should be paid to the impact on traffic patterns within the planning area from dramatically increased development, whether in the Near Southeast, Reservation 13, or elsewhere. Challenges remain due to the presence of I-695 and the need to ameliorate its impact on the adjoining neighborhoods.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019 Draft Version)

- 1500.2 (“The Planning area is bounded to the north by Florida Avenue and Benning Road, NE. To the south, the area is bounded by the Southeast portion (I-695) of the Southeast-Southwest Freeway between South Capitol Street and 11th Street SE and the Southeast Boulevard extending further eastward from 11th Street. To the west, the area is bounded north of the Captiol generally by 1st Street NE and south of the Capitol by South Captiol Street and New Jersey Avenue SE. The Anacostia River provides a natural border to the east.
- 1500.5 (“...On any given weekend, thousands of residents and tourists visit the market. New Jersey Avenue SE, 3rd Street SE, 4th Street SE, 6th Street SE, 8th Street SE, and 11th Street SE provide ready access to the burgeoning complex of governmental, commercial, and residential development that has been occurring for the last 10 years immediately south of the Capitol Hill Planning Area on the other side of the Southwest-Southeast Freeway (I-395/I-695), including the Nationals Baseball Stadium and surrounding commercial development. Access to and from the Freeway is provided by an entrance on 3rd Street SE and an exit on 6th Street SE, providing easy access to and from points in Virginia and Maryland.
- 1500.7 (“...Sherwood Recreation Centers, and many smaller pocket and triangle parks. Garfield Park provides a southern buffer just to the north of the Southeast/Southwest Freeway. It is Also home to...”)
- 1501.7 (“...Neighborhoods to the north of Capitol Hill, particularly in the areas around the H Street, NE corridor, experienced growth due to the popularity of H Street amenities and significant infill residential development that has been built in the last ten years. Neighborhoods to the south of Capitol Hill are benefiting from the burgeoning governmental, commercial, and residential development occurring immediately south of the Southeast-Southwest Freeway (I-395/I-695).

Subject: Relationship of Capitol Hill to Navy Yard

Element: Capitol Hill

ANC Vote: 10-0-0

- 1505.1 (“... Additional job growth may also take place on Pennsylvania Avenue. Residents may also benefit from increased nearby job opportunities arising south of the Southeast-Southwest Freeway (I-395/I-695). Please see the Economic Development Element....)
- 1508.14 (“...Measures should also be implemented to route through-traffic around residential neighborhoods, and to restrict trucks and heavy vehicles on local streets. Monitor increased traffic patterns on New Jersey Avenue SE, 3rd Street SE, 4th Street SE, 6th Street SE, and 8th Street SE attributable to increased economic activity south of the Southeast-Southwest Freeway (I-395/I-695) and establish strategies to mitigate harms caused by such traffic patterns. As development expands to other parts of Capitol Hill, including the 11th Street Bridge Park, Reservation 13, and elsewhere, similar mitigation efforts should take place.

Subject: Conforming Changes

Element: Capitol Hill

ANC Vote: 10-0-0

ANC 6B Comment:

ANC 6B encourages the Office of Planning to make the following additions to the Capitol Hill Element to make it more accurate:

1500.4 (“Other parts of the Hill include concentrations of flats and small apartments, including publicly subsidized housing complexes such as Potomac Gardens. Much of the Capitol Hill neighborhood was included in the Capitol Hill Historic District, originally established in 1973 and subsequently expanded several times. Kingman Park was designated a Historic District in 2018.

1500.6 (“The southeast portion of the Hill is served by the Capitol South, Eastern Market, Potomac Avenue, and Stadium-Armory Metro Stations.”)

NEW (“Major modernization efforts have been completed or are planned for Stuart-Hobson, Elliot-Hine, Watkins, Jefferson, Brent, and Eastern schools to better accommodate growth and a modern educational system. As part of the District’s ongoing effort to renovate and modernize libraries, both the Rosedale and Northeast Libraries have undergone significant renovation to better serve Capitol Hill Planning Area neighborhoods, and significant renovations are planned for the Southeast Library. *(This is an OP-proposed new paragraph after 1500.7 that new augmentation)*

ANC 6B Comment:

ANC 6B welcomes the perspective on the importance of environmental issues presented in the Comprehensive Plan. The new attention to climate change issues such as flooding, consideration of equity aspects of air quality and environmental issues, and the need to restore and expand the wetlands are especially appreciated.

*We find the removal of the discussion of tree cover at the end of paragraph 600.4 to be strange

*We propose restoring the language in 620.1 to recognize that density in and of itself does not produce noise pollution

*We believe the discussion on helicopter noise needs to be broadened as helicopter noise poses unique problems compared to all aviation.

*Discussion of costs and benefits of environmental programs should not be removed from the comp plan without alternative proposed language.

*Measuring the effects of light pollution and visual clutter should be added as an action item to paragraph 620

*Studying the impacts and mediating the effects of playfield filler, including tires, should be an action item in 621.19

*The removal of paragraph 624.2 is unwarranted and mitigation of known and unknown hazards of EMF and 5G cell towers is appropriate in the Comprehensive Plan.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019 Draft Version)

600.4 But reality is another story. Washington's legacy as America's "greenest" city has been seriously challenged over the centuries by urbanization. In recent years, Washington, DC has made great strides in incorporating sustainability measures; however, we must continue to learn, to plan, and to sustain this momentum to meet our city's goals. Although the region's air is cleaner than it has been in 20 years, our air quality does not meet federal standards for ozone, and our rivers and streams are polluted by raw sewage and urban runoff. Ninety percent of Washington, DC's wetlands have disappeared since 1790. Some sites in the city face soil and groundwater contamination problems from former industrial uses and municipal waste disposal. The District should review the numerous actions underway to take to restore tree cover and should develop an analysis suitable for addressing the question: "If we continue present actions, when might we reasonably expect to reach our tree sustainability goals?"

620.1 Noise affects the general health and well-being of District residents. High noise levels can create a host of problems, ranging from stress to hearing loss. Noise can also impact urban wildlife. In the noisiest parts of the city, the sounds of cars, trucks, buses, helicopters, and sirens may seem almost constant. Even in relatively quiet parts of the city, household noise sources like car alarms and leaf blowers can be a source of annoyance. Regardless of density, the maintenance of "peace and quiet" is a basic expectation in most District neighborhoods, it must be balanced with the realities of living in a vibrant and growing city. 620.1

Subject: General Comments**Element:** Environmental Protection**ANC Vote:** 9-1-0

- 620.12 *Action E-54.3.D: Reduction of Helicopter Noise*
Encourage the federal government to reduce noise from the operation of helicopters, especially over residential areas along the Potomac and Anacostia Rivers during night-time and early morning hours. Any new or relocated heliport/helipage or new or rerouted helicopter flight path shall not expand the existing impact on existing residents
- 624.8 *Action E-5.7.A: Study impact Visual Clutter and Light Pollution on people*
Flashing lights (e.g., in entertainment districts), multiple signs on a post, and trash and newspaper boxes in disarray reduce the quality of life in DC. A study of visual pollution across the city should be undertaken along with an assessment of the adequacy of regulations to address this problem.
- 630.5 *Policy E-6.4.3: Cost-Benefit Analysis*
Ensure that cost estimates for environmental programs consider not only immediate costs but also the long-term value of the benefits that will result. To demonstrate long-term value, fiscal impact assessments should consider the long-term cost of not implementing environmental programs as well as the short-term cost of implementing them. 630.5
- 630.6 *Action E-6.4.B: Playfields safety and impacts on people and wildlife*
Many new playfields in the District, e.g., the new RFK fields, are using shredded rubber tire components that include many toxic substances. As the fields wear the toxic material is released into the atmosphere and can be eaten by birds and other wildlife. Undertake a scientific review of the health hazard potential of play grounds built of recycled rubber and discontinue construction of new playgrounds using this material until there is clear scientific evidence of its impact on the health of children exposed to the play fields.
- 624.2 Because the introduction of small cell transmitters throughout an urban area is a recent phenomenon about which little evidence currently is available, an environmental epidemiology study should be undertaken with the NIH to closely observe any impact on residents, especially young children.

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Comprehensive Plan Introduction Element

Capitol Hill Village (CHV)

1. *100.5 Planning for an Inclusive City needs to recognize the special needs of the growing number of older adults, especially as they become frail. To this end, CHV recommends the following addition to 100.5:*

100.5 As we think about our future, other issues arise. How will people get around the city in 20 years? Where will our children go to school? **How will the needs of our growing aging population be met as they move from being active older adults to becoming less capable to take care of themselves?** Will police and fire services be adequate? Will our rivers be clean? Will our air be healthy? ~~How will we resolve the affordable housing crisis and ensure that housing choices are available for all residents?~~ **How do we address housing affordability and ensure that current and longtime residents have a place in the future of the city?** ~~How can we ensure that residents have access to the thousands of new jobs we are expecting?~~ **How can we ensure the District continues to produce jobs and that District residents have the supports they need to take these jobs and find pathways to success?** ~~How will the best parts of will the character of our neighborhoods be conserved preserved and the challenging parts improved? How will federal and local interests be balanced?~~ 100.5

2. *103.4 Figure 4.1 **1.2:** The Family of Plans 103.4
CHV notes that several important plans are not included in this figure.*

(1) **Add DC City Council mandated "10-year Senior Strategic Plan.** *The Department of Aging and Community Living is the lead agency in developing this comprehensive city-wide plan.*

(2) **Add "Reservation 13 Master Plan" to this figure.** *We suggest it might fit under "Area Elements - Related Studies and Plans."*

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Housing Element

Capitol Hill Village (CHV)

Capitol Hill Village endorses the Age Friendly DC Initiative's contribution to the Comprehensive Plan. We are pleased to see that the changing older adult housing needs are recognized.

1. *500.2. CHV proposes that Section 500.2 recognize the special housing challenges facing our older adult population faces as they become frail as follows:*

500.2. The critical housing issues facing the District of Columbia are addressed in this section. These include:

- Ensuring housing affordability **across all incomes**
- **Furthering fair housing opportunities especially in high cost areas**
- Fostering housing production **to improve affordability**
- **Preserving existing affordable housing**
- **Promoting more housing proximate to transit and linking new housing to transit**
- **Restoration or demolition of vacant blighted properties**
 - Conserving existing housing stock
- **Maintaining healthy homes for residents**
- **Promoting appropriate housing alternatives for older adults and other vulnerable populations, that include social and health services**
 - Promoting home ownership
 - **Ending Homelessness**
 - Providing housing **integrated with supportive services** for residents with special needs. ~~integrated with supportive services.~~ 500.2

2. *503.8 Policy H-1.1.7: Large Sites. The omission of senior services is a serious omission and can be rectified by the following revision:*

*503.8 Policy H-1.1.7: ~~New Neighborhoods.~~ **Large Sites.***

Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition **to giving priority to market rate and affordable** housing, these neighborhoods

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~~must~~ **should** include **or have access to** well-planned retail, public schools, attractive parks, open space and recreation, **enable resilient, innovative neighborhood level energy systems,** as well as needed supportive services **for seniors and other residents with special needs.** The new neighborhoods should include a variety of housing types, serving a **diverse population and a** variety of income levels. 503.8

3. 505.5 *Capitol Hill Village recommends important changes to this paragraph about the need for diverse housing stock:*

505.5 An important part of growing ~~"inclusively"~~ **inclusively** is to **develop and maintain, across neighborhoods and throughout the city,** a **diverse** housing stock **of all sizes and types** that can fit the needs of **the all variety** of ~~these~~ households **including growing families as well as singles, couples, and aging residents who hope to stay in their homes or choose to as they transition from independence to skilled nursing care alternative housing.** At its most extreme, market pressures may result in displacement as affordable large rental units are converted to ~~"luxury"~~ upscale condos or upscale apartments. More often, these pressures ~~simply~~ mean that families are having a harder time finding suitable housing in the city. The vacancy rate provides a good barometer of this dilemma. In ~~2004~~ **2017**, the vacancy rate was ~~8.8~~ **13** percent for studios and one bedroom units, but it was just ~~4.4~~ **8** percent for units that were ~~two~~ three bedrooms or larger.

4. 505.8 *Policy H-1.3.3: Assisted Living and Skilled Nursing. Capitol Hill Village fully supports the Policy H-1.3.3 with the addition of adult day service to facilities. Such facilities, which would also provide services to families caring for family members with dementia, are greatly needed in the Capitol Hill Planning Area. CHV recommends the following revision to this policy:*

505.8 *Policy H-1.3.3: Assisted Living, **Adult Day Services,** and Skilled Nursing.* Promote the development of **neighborhood based assisted living, adult day services with dementia care,** and skilled nursing facilities. Zoning and health regulations should be designed to promote an increase in supply, security, and affordability of housing for the elderly older adults. 505.8

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5. 506.12 Policy H-1.4.6: Whole Neighborhood Approach . The omission of senior services is serious and can be rectified by the following revision:

506.12 Policy H-1.4.6: Whole Neighborhood Approach. Ensure that the planning for, and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, child care, **senior services**, food access, parks, community gardens and open spaces,

health care facilities, police and fire facilities, transportation, and emergency response capacity. 506.12

6. NEW H-4.3 Meeting the needs of Specific Groups. (page. 73)

CHV recommends that the Office of Planning check the forecasted demographics provided under "Older Adults" on page 74. In studying the obvious error in the number of 85+ year olds projected for 2030, CHV found the 2030 projection of 60+ year olds is different than that given in the Community Services and Facilities (CSF) Element (1108).

Capitol Hill Village suggests OP correct the number by using the 2030 projection used in the CSF element, Chapter 11, which is 141,000. As we do not know OP's methodology for projecting the number of residents over 85, we suggest a reasonable forecast might be to use the projected number of residents over 85 at the same percentage level experienced in 2017. Using our analysis, CHV proposes the following update:

Pasted ~~Seniors~~ Older Adults

In ~~2000~~ **2017**, there were ~~70,000~~ **118,275** District residents **age 60 and over**, including ~~8,500~~ **12,133** residents ~~over 85 and over~~. As the baby boom generation matures and as average lifespan increases, the population of ~~seniors~~ residents age **60 and over** in the District is expected to increase dramatically. ~~At the national level, the Census projects the number of senior citizens will increase by 104 percent between 2000 and 2030 almost four times the rate of the population at large. By 2030, there will be 133,000~~ **141,000** residents **60 and over**, of which ~~12,000~~ **14,500** will be **85 and older**. There will be a need for a broad range of senior living environments, serving residents across the income spectrum.

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7. Policy H-~~4.2.2~~ 4.3.2: Housing Choice for ~~Seniors~~ Older Adults . (page 76)
CHV is pleased the Comprehensive Plan recognizes the role of "senior village" organizations, of which there are now over a dozen in the District of Columbia alone. We recommend the concept be defined for the readers of the Comprehensive Plan as set out below.

Pasted Policy H-~~4.2.2~~ 4.3.2: Housing Choice for ~~Seniors~~ Older Adults

Provide a wide variety of affordable housing choices for the District's seniors older adults that enable them to age in their neighborhoods either by supporting their ability to remain in their home, or by providing new opportunities for one-level living within multi-unit buildings that include universal design elements and intergenerational options. ~~taking~~ Take into account the income range and health-care needs of this population. Recognize the ~~coming~~ forecasted growth in the ~~senior~~ older adult population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority. Acknowledge and support the establishment of Senior Villages* throughout the city that help seniors to remain in their homes and communities. ~~age in place.~~ 516.8

** A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. More information about this nationwide movement is available at the Village to Village Network website: <https://www.vtvnetwork.org/>*

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Land Use Element

Capitol Hill Village (CHV) Comments

309.6 *CHV suggests several revisions to the discussion of what makes a good neighborhood and proposes recognition of a broader range of diversity.*

309.6 What Makes a Great Neighborhood?

A successful neighborhood should create a sense of belonging, civic pride, and a collective sense of stewardship and responsibility for the community's **present and** future among all residents. Indeed, a neighborhood's success must be measured by more than the income of its residents or the size of its homes. Building upon the

~~In 2004, "A Vision for Growing an Inclusive City" identified essential physical qualities that all neighborhoods should share. These included:~~

- Transportation options for those without a car, including convenient bus service, car sharing, bicycle facilities, and safe access for pedestrians;
- Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down restaurants;
- Housing choices, including homes for renters and for owners, and a range of units that meet different needs of the community;
- Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature;
- Quality public services, including police and fire protection, high-quality, safe and modernized schools, health services, and libraries and recreation centers that can be conveniently accessed ~~(though not necessarily located within the neighborhood itself)~~;
- Distinctive character and a "sense of place", defined by neighborhood architecture, visual landmarks and vistas, streets, public spaces, and historic places;
- Evidence of visible public maintenance and investment—proof that the city "cares" about the neighborhood and is responsive to its needs; and
- A healthy natural environment, with street trees and greenery, and easy access to the city's open space system.

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The understanding of what makes a great neighborhood has evolved, particularly in terms of addressing social equity, advancing sustainability, and building community resilience to everyday challenges as well as environmental and manmade disasters. Where a resident lives - their neighborhood - remains one of the greatest predictors of individual health and economic outcomes. To achieve inclusive growth, neighborhood success must not only include achieving the desired physical characteristics but also ensuring that every community plays a part in supporting investment and development that advances neighborhood vitality, growth, and economic mobility, and increases access, equity, and where appropriate, jobs. A neighborhood's success must be measured by more than the income of its residents or the size of its homes. A successful neighborhood should create a sense of belonging and civic pride, and a collective sense of stewardship and responsibility for the community's future among all residents.

Today, we recognize that great neighborhoods include racially, socially, and physically diverse residents and offer access to support services for those who have special needs, such as seniors who are becoming frail and others with disabilities. The positive elements that create the identity and character of each neighborhood should be preserved and **enhanced**. ~~enhanced in the future.~~ 309.6

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CAPITOL HILL PLANNING AREA ELEMENT

Capitol Hill Village(CHV) Comments

1. **1503.2 Demographics.** *Based on the numbers in the new Table 15.1, OP's characterization of the growth in the number of seniors in the Planning Area is not correct. CHV proposes revision as follows:*

1503.2 Since 2000, a majority of the population within the Capitol hill Planning Area (73%) is between the ages of 18 and 65. This is slightly higher than the citywide total of 70 percent. While the number of seniors is higher now than in 2010, the percentage of seniors within the Planning Area is slightly lower.

2. **NEW** Table 15.1. *The proposed title should be corrected to read 15.1 Capitol Hill Planning Area at a Glance.*
3. **1507. See Introduction for Summary of Community Engagement.** *CHV has not been able to find this summary. Queries to OP on this have not been answered. As a result, CHV is uncertain of how our 2017 recommendations were treated in this Draft Amendment..*
4. **1508.11. Policy CH-1.1.10: Public Housing.**

(a) Please note that the redline draft incorrectly identifies this section as 1509.11, rather than 1508.11.

(b) In CHV's participation on the ANC6B Comprehensive Plan Working Group, some community members have reported a high level of anxiety and doubt among residents of public housing in the Planning Area that rehabilitation of public housing projects will be replaced in kind by new public housing units within the community. (2006 Comprehensive Plan 1508.11, see page 19 of Draft Amendments Chapter 15) These residents fear that, to the contrary, this policy will actually result in displacement of residents.

Existing public housing units provide much needed housing for low income older adults, including grandparents who care for their grandchildren. In fact, we understand that many residents in the Potomac Gardens complex are seniors—either living alone or with extended family. Many of these older residents have called Potomac Gardens Public Housing their home for decades. Some residents do not want to be relocated to new units elsewhere in the community; to relocate

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means changes in children's and grandchildren's schools, loss of well-known neighbors, and, potentially, less convenient access to public transportation. Capitol Hill Village urges OP to consider how the Comprehensive Plan's public housing policy can address and mitigate the impacts on older residents associated with rehabilitation of public housing units.

5. 1508.13 Policy CH-1.1.12 RFK Stadium Area. *The lands and resources around RFK stadium and the Reservation 13 site provide an unprecedented opportunity to build an innovative, multi-generational neighborhood that serves families and older adults with a full range of incomes, including those needing long-term care services. Reservation 13 is a large site that de facto will become a major new neighborhood. It will need coordinated public services, housing, retail, and space for recreation. The Comprehensive Plan should recommend a creative mixture of housing for a range of income levels, and long-term care facilities for a range of income levels and intergenerational inter-action. Implementing the Reservation 13 Master Plan offers the District an unparalleled opportunity to innovate and to become a model for the integration of older persons and long-term care into a thriving multi-generational and multi-income neighborhood.*

CHV also believes that development of the RFK and Reservation 13 sites offers excellent opportunities for coordinated planning for recreation, parkland, and mitigation of negative effects of heavy traffic in the area. While we support environmentally appropriate development of the waterfront and adjacent open space in a manner that provides access to the neighbors, we also believe that the shoreline and parklands should be equally available to DC residents of all ages and physical condition and from all city neighborhoods. We also recommend that OP add an additional sentence to 1508.13 which would give preference to maintaining more natural landscapes along the River, over highly developed landscapes.

Our proposed revisions to this section follow:

1508.13 Policy CH-1.1.12 RFK Stadium Area. **RFK Stadium and the surrounding area are currently leased by the DC Government from the National Park Service, with the restriction that development be limited to sports, recreation and entertainment. The lease expires in 2026, but the District has initiated a process to transfer the land from the Park Service to the District. Restricting the use of the land to sports and recreation, if not entertainment uses, is consistent with preferences of adjacent neighbors and residents of the wider Planning Area.** Provide improved buffering and ~~landscaping~~ **landscape** screening along 19th Street and elsewhere in the vicinity of RFK Stadium in order to reduce the effects of noise, dust, vibration, and air pollution on the adjacent Hill East community. Work collaboratively with the National Park Service, **District agencies, Events DC**, and National Capital

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Planning Commission on long-range plans for the stadium and adjacent parkland and parking lots. The highly successful project, the Fields at RFK Campus, offers a model for how Events DC can collaborate with the neighborhood and other stakeholders. Waterfront open space in this area should be retained and improved for the benefit of all DC residents as well as adjacent Hill East, Kingman Park, and Rosedale residents. Improvements should include the creation, and maintenance, of a pedestrian and cyclist shoreline access path, and well-designed public spaces. Recreational and green spaces should include features for people with disabilities or for aging adults. Reduce the amount of land occupied by surface parking and maximize activity along the waterfront.

Give preference to retaining the natural character of the landscape along the shoreline while allowing access to enjoy the river and its shoreline. See also 1514.8 Reservation 13 Parkland and ~~See the Urban Design Element for additional policies related to parks and open space.~~ 1508.13

6. 1509.6 Policy CH-1.2.6: Improved Park and Recreation Services. *CHV is very pleased that OP has endorsed our proposal for triangle park improvements throughout the Capitol Hill Planning Area, as these little parks are very popular with older residents.*

7. 1514.13 and 1514.4 Narrative. *The Draft Amendments refer to the Master Plan for Reservation 13 in inconsistent ways—as (1) the Hill East/Reservation 13 master plan, (2) the Hill East Development Plan or (3) the Hill East/Reservation 13. CHV recommends that OP choose one title for consistency.*

Also, the narrative description of the Master Plan (hereafter Reservation 13 Master Plan) needs to be updated to reflect the Mayor's recent decision to convert one of the first phase buildings to provide housing for homeless individuals. To this end, we offer the following proposed addition:

1514.4 The adopted Reservation 13 Master Plan retains **the historic Anne Archbold Hall**, DC Jail, and other institutional uses and identifies approximately 40 acres for redevelopment. New facilities for health care and recreation are envisioned, along with new housing, offices, retail, and institutional uses. Key urban design features include extension of the Capitol Hill street grid into the site, new parks, and new access to the waterfront, including a great meadow overlooking the shoreline. Other notable elements of the plan include extension of Massachusetts Avenue to the Anacostia River and a village square at the Stadium-Armory Metrorail station. The preliminary development program identifies the potential for 800 new housing units and over 3 million square feet of non-residential space, roughly doubling the total square footage of buildings on the site. **In May 2016, Phase 1 of the Hill East development received Design**

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Review Approval, and the District selected a development partner. The buildings are under construction and near completion. Originally, this first phase will was to include over 350 residential units, with 30 percent designated for affordable housing, and additional retail and green spaces. In fall 2019, the Mayor announced that one of the residential buildings will be converted to Permanent Supportive Housing for individuals who are now homeless and require supportive services. Residents will have access to social workers and other support services.

8. *1514.6 Policy CH-2.4.1 Redevelopment of Public Reservation 13. OP's proposed new text to "recognize this site as an ideal location for an anchor employer or institution" raises concerns about whether this Mayor or future Mayors might continue to use Reservation 13 to entice big anchors such as the recent identification of Reservation 13 as available to Amazon Corporation for locating its East Coast headquarters. We believe the Plan should address the importance of moving ahead with implementation of the Master Plan which was approved in 2006. CHV proposes the following revision:*

1514.6 Policy CH-2.4.1: Redevelopment of Public Reservation 13.

Redevelop Reservation 13 as a mixed-use neighborhood that combines an array of housing, retail, office space, health care, civic, ~~education~~, educational, institutional, and recreational uses and amenities. There is sufficient space for Reservation 13 to meet affordable housing and other goals, particularly services and amenities that meet the special needs of aging residents. To the extent consistent with the Master Plan, recognize this site as an ideal attractive location for an anchor employer or institution. Retention of ~~Established~~ established uses, such as the DC Correctional Facility, should be re-assessed ~~retained~~. Health care and institutional uses on the site should be reorganized to accommodate infill uses, improve the site's vitality and efficiency, and create an environment more conducive to pedestrian travel. 1514.6

9. *1514.8 Reservation 13 Parkland. Capitol Hill Village is concerned that this section calls for a "grand" waterfront park, albeit one designed for resilience to flooding, etc. Such a goal connotes a highly built out park which is inconsistent with the desires of neighbors and other residents of the Planning Area to maintain a more natural approach to accessing and enjoying the waterfront. CHV recommends this the word "grand" be removed and a cross reference to 1508.13 be added as follows:*

1514.8 Reservation 13 Parkland. Create new waterfront parklands and green spaces at Reservation 13, including a grand waterfront park that is designed both for recreation and designed for resilience to flooding, and that includes recreational trails along the waterfront, smaller neighborhood parks and open spaces within the site, and tree-lined pedestrian streets. See also 1508.13, Policy CH-1.1.12 RFK Stadium. 1514.8

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10. **NEW 1514.12 Action CH-2.4.A:** *The Reservation 13 development will create a major new neighborhood. Accordingly, the city must devise a community-based land-use plan to determine the public services, facilities, and infrastructure needed to serve this new neighborhood. CHV believes this can be done within the context of implementing the Master Plan; however, if the Comprehensive Plan fails to specifically require consideration of land uses and*

services, facilities, and infrastructure, the Village wants to ensure that this level of community engagement is not overlooked in the process. Accordingly, CHV proposes that OP revise this action item by adding the following to the proposed text as follows:

1514.12, Action CH-2.4A:Hill East/ Reservation 13 Master Plan. Implement the Hill East/Reservation13 Master Plan, including the Massachusetts Avenue extension and the creation of new waterfront parks. ~~Upon transfer of the land from federal to District control, the site should be rezoned to achieve the Master Plan objectives~~ Explore the need for building a recreation/senior center/library in Reservation 13. Explore creating senior recreation spaces that include indoor walking opportunities. Coordinate this study with Events DC to determine if any of these recreational needs can be met through development of the RFK Stadium site. Specifically consider developing an adult day care facility on Reservation 13 that can serve at least 50 people per day (approximately 9000 square feet) Study the feasibility of repurposing the historically significant Anne Archbold Hall for senior-oriented health services to include hospice, rehabilitation, adult day care, and memory care services . 1514.2

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Community Services and Facilities Element Capitol Hill Village (CHV)

1. *Capitol Hill Village supports the following new policy and revised action if amended to include the addition of senior services and to recognize the needs of our growing older adult population.*

NEW Policy CSF-1.1.10: Agency Coordination for Co-Location Strategies
Ensure that the Civic Facilities Plan includes inter-agency coordination for co-location of public uses early in planning and project initiation processes to ensure that critical input is captured and incorporated. Joint planning of District-operated facilities with other community facilities such as schools, *senior services*, health clinics, community kitchens, healthy food growing or retail spaces, and non-profit service centers should also be supported through ongoing communication and collaboration among relevant District agencies and outside agencies and partners.

1103.15 Action CSF-1.1.A: ~~Civic Master~~ Public Facilities Plan

Continue to ~~d~~**Develop** and **refine the District's multi-layered approach** to a ~~Master~~ **Public Facilities master planning (MPFP)** to ensure adequate community facilities and ~~infrastructure~~ **are provided for existing residents and can be provided for new neighborhoods in Washington, DC, and to including by** providing guidance for the long-term ~~(six-year)~~ **Capital Improvements Program (CIP)** and the ~~6-year~~ annual capital budget. The ~~approach~~ **MPFP** should include an assessment of all District-owned or maintained community facilities and property and should identify what improvements are needed to correct deficiencies and address planned growth and change in the District. The facilities plan should be continuously maintained and updated regularly with new priorities and timelines. As needed, the Comprehensive Plan should be amended to incorporate the **MPFP master facilities planning** findings ~~and to add newly developed benchmarks and standards, acreage and locational requirements for various public uses, and identification of sites for new or refurbished facilities.~~ As part of ~~this work the MPFP and for each planning cluster,~~ the appropriate ~~planning~~ agency shall **continue to** annually collect and publish data on public school capacity and enrollments, ***senior services***, recreational facilities, libraries, emergency medical service response time, sewers, green space, public transit capacity including

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bus routes and ridership statistics for Metrorail stations and lines as well as parking availability, and traffic volumes on roads and at key intersections. These data should be used **as appropriate** when evaluating the need for facility and infrastructure improvements, and for ~~evaluating appropriate densities for development in various neighborhoods both in the rezoning process and for planned unit developments.~~

1103.15

2. *CHV agrees with the proposed NEW Policy CSF-2.1.1: Enhance Health Systems and Equity if it is amended to include age as follows:*

NEW Policy CSF-2.1.1: Enhance Health Systems and Equity.

Support the Strategic Framework for Improving Community Health, which seeks to improve public health outcomes while promoting equity across a range of social determinants that include health, race, income, age, and geography.

3. *Capitol Hill Village (CHV) recommends **that the Plan include** the number of residents that Assisted Living Residences (ALRs) can serve, and their locations by quadrant in the District. We also recommend identifying those ALRs that accept subsidized fees. This is critical for identifying big gaps in the distribution of assisted living units across the city and especially for **identifying gaps in assisted living units available to lower income older people.***
 - a. **NEW** Follows 1106.10. CHV notes that a new citation is needed for these new paragraphs.

In addition to hospitals, the District counts on a broad array for facilities that provide a wide range of healthcare and health services. Many of these facilities provide services that enable Washington, DC residents to age in their communities. As of 2017, the District has twelve Assisted Living Residences (ALRs) which provide long-term care in the form of housing, health and personalized assistance. Some Washington, DC residents who are not eligible to receive Medicaid benefits find it challenging to pay for ALR care.— Out of a total of 731 ALR living units as of summer 2018, there are none in Wards 5, 6, 7, and 8. Of two currently operating ALR facilities providing any subsidies, there are less than 100 subsidized units. Two ALR buildings in Wards 7 and 8 are planned for 300 units to open in 2021 and 2022 for those with Medicaid waivers. The eight facilities with full-priced ALR units charge basic fees that range from \$45,000 to \$100,000 per year, fees that are beyond the household budgets of DC residents with incomes between 30% and 100% of Median Family Income (MFI). Many of the smaller, private-pay ALR providers closed their

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doors in recent years due to inability to meet regulatory requirements or attain financial support.

b. **NEW Table 11.3. Health Services Facilities in the District (p.35)**

To provide meaningful data or the amount of service provided by facilities, Capitol Hill Village recommends:

- Insertion of a new column, called "Number of living units/or beds," after the column "Number in the District".
- Enter the Summer 2019 number of assisted living units in DC, "731", into the data element cell for ALRs and the new column.
- Add similar data for the service numbers (or "beds") available for Hospices and other facilities listed.
- **Add to the Notes in the last column that no ALRs were located in Wards 5, 6, 7, or 8.**

4. 1106.14 (p. 36) *CHV recommends that "housing" be added to Policy 1106.14 as follows:*

Policy CSF 2.3.3 Coordination of to better Serve Special Needs Residents. Design and coordinate health, **housing**, and human services to ensure the maximum degree of independence for senior citizens, the disabled, and mentally handicapped. **Locate health services within multi-unit senior housing to ensure best and least expensive management of chronic illnesses in these vulnerable groups. These services are particularly important for households with incomes between 30% and 100% of MFI, and the senior citizens who are not eligible for Medicaid and who cannot pay the fees for private ALRs.**

5. 1106.18 (p. 37) *CHV believes hospice facilities are very important for families who cannot manage the needs of dying family members in their homes. Note: A doctor's order stating the patient is in their last 6 months of life is necessary for qualifying for hospice care. The need is great the eastern sections of the District. CHV recommends the following revisions:*

Policy CSF-2.3.7 Hospices ~~and Long-Term Care Facilities.~~

Support the development of hospices **and other long-term care facilities for persons with advanced HIV/AIDS, cancer and other disabling illnesses such as dementias,**

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including alzheimers.—in all neighborhoods for those who qualify and are unable to receive hospice services in their homes

6. **Increasing Supply of Facilities that Support Assisted Living. (NEW Policy CSF-2.3.8)**
Capitol Hill Village encourages increasing the supply of Assisted Living Residential Facilities but also urges that Adult Day Services with dementia care be added to this policy as the needs are great, especially in the eastern half of the city. The new IONA adult day services scheduled to open in Ward 8 in 2020 and the newly approved Medicare and Medicaid-funded PACE (Program of All-encompassing Care of the Elderly) to be located in Ward 7 are a start to meeting the growing demand for adult day programs. The two large affordable ALR projects in development in Wards 7 and 8 are the only ones designed for large numbers of residents with Medicaid waivers.

NEW Policy CSF-2.3.8: Increasing Supply of Facilities that Support Assisted Living, Adult Day Services and Dementia Care.

Promote expansion of the supply of neighborhood-based facilities that provide assisted living services in Washington, DC. These include Assisted Living Residential facilities (ALRs) and Community Residential Facilities (CRFs) as well as Adult Daycare facilities.

7. **New Policy CSF-2.3.9: Improving Access to Long-term Supports and Services for Vulnerable Populations.**
Continue to improve access to Long-term Supports and Services (LTSS) for vulnerable populations, including people with disabilities and older adults and their families. Enhance the network of government and non-profit organizations that provide LTSS to these individuals and seek to improve their experience. Encourage the development and expanding roles of aging-in-place "senior villages" who enlist and train volunteers to provide services to other village members, especially those that are more vulnerable.

***A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. Learn more about this nationwide movement at the Village to Village Network website: <https://www.vtvnetwork.org/>**

8. *Capitol Hill Village endorses the following Action. The idea of smaller ALR/CRG facilities available in more neighborhoods may provide residents the ability to more easily retain friendships and ties to family. Neighborhood based adult day services can be a boon to family members who care for their disabled loved one and who must transport them to such a service.*

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Action CSF-2.3.B. Increase ~~in~~ Supply of Assisted Living Residential Facilities (ALRs), and of Community Residential Facilities (CRFs), and Adult Day Care Facilities.

Explore a variety of approaches for increasing the number of CRGFs as well as small and mid-size ALR facilities in underrepresented areas, **such as all of Wards 5, 6, 7, and 8,** and areas of high need in the District. **Promote the construction of affordable ALRs for the elderly and disabled eligible for Medicaid waivers. Promote the construction and launching of ALRs and adult day care that are designed for those older and disabled people with dementias, including Alzheimer's. These approaches can include financial strategies and partnerships as well as regulatory reform. Work to increase community awareness of these needs so that neighborhoods will be ready for the increase in the population of older and disabled residents.**

9. **1108 Senior/Older Adult Care (p. 40)** *Capitol Hill Village analysts suggest the use of rounded numbers when presenting projections or forecasted data to avoid misleading precision. We recommend that OP add the results of our analysis of American Community Survey data which provides insight into the realities of many aging District residents as follows:*

1108.1 The population of older adults or Sseniors (persons 60 years of age and older) is expected to continue to grow at a steady rate ~~are expected and~~ to be the fastest growing segment of the District's population during the next **15 to 20** years. Although the District's ~~Office on Aging~~ **Department of Aging and Community Living (DACL)** and several affiliated non-profit organizations already provide a comprehensive system of health care, education, employment, and social services for ~~Washington, DC's the District's~~ elderly population, these entities may be hard pressed to keep up with demand as the number of **older adults seniors** in the city rises. **The 2017 older adult population of 118,275 (17 percent of the total population) is forecasted to rise to 132,648 133,000 in 2025 and to 141,384 141,000 by 2030. As of 2017,** Currently, about ~~45~~ **36** percent of the city's **older adults seniors 65 years and older** live alone. Some ~~43~~ **37.4** percent of **older adult households** have no personal vehicle and ~~42~~ **36.5** percent have some type of a **physical** disability. **One group of older adults is especially vulnerable. In an analysis of a 2017 sample from the U.S. census, of 76,000 District adults 65 or older living in households, 13,000 had a difficulty (or disability) living independently. Of these 13,000 older adults, 6,200 also had a difficulty with self-care (such as bathing or dressing) and 5,500 had a cognitive difficulty. These are the older people that already need long-term care and long-term support and facilities for these people are already insufficient.**

The largest percentages of older adults ~~seniors~~ are in ~~Upper Northwest~~ **Rock Creek West** and Far-Northeast **Rock Creek East**. Many are homeowners, caring for their properties ~~with diminished on fixed incomes and physical mobility~~. Others are primary caregivers for their grandchildren, facing the challenge of raising a family in their advancing years. 1108.1

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However, a large majority of these households with adults 65 and over, would have extreme difficulty paying for any long-term care. Of 59,000 households with an adult 65 and over, 11,500 have someone who has difficulty living independently. Of these 11,500 households, 4,500 have incomes that are 30% or less of the Median Family Income (MFI), and 5,500 have incomes that are 31% to 100% of MFI.

Those households below 30% of MFI that have Medicaid would qualify for home health aides and a few other services through the Medicaid waiver program. Until 2021, there is no assisted living in wards 5, 6, 7, and 8 that will take Medicaid waivers and very few in Wards 1-4. Those households between 31% and 100% of MFI, sometimes called "the forgotten middle" could not begin to pay for market rate assisted living that ranges from \$45,360 to \$126,000 a year. At the low end of the middle, they could not pay for unsubsidized home aides at \$20 per hour. At the high end they could afford only limited hours of home health aides (for example, home aides at \$20 an hour for 4 hours a day for 5 days a week, would cost \$20,800.) With no paid long-term care, many of these households struggle to manage the disabled older member. 13% percent of these middle income households have only one member, who manages self-care with difficulty. 21% percent of these households are married couple households where a spouse carries the burden of care for the older adult who cannot live independently. (1808.1)

10. CHV recommends adding the following action:

Action CSF-2.3.A Develop the Demographics of Residents over 65 who have disabilities to compare with available facilities that can support them. Demographics of DC residents 65 and over with disabilities should be presented by broad location and compared to the availability of the facilities and services for older adults with chronic illnesses, or with certain disabilities. The facilities should include assisted living residences, community residential facilities, and adult day care. The categories of older adult disabilities to be examined should include those with: cognitive difficulty, self-help difficulty and other conditions that create difficulty with living independently.

11. CHV recommends the following action item be included to address a looming issue among DC middle income seniors:

CSF-2.3.B "Middle Income" Older Adults—"The Missing Middle"

Conduct a study of those households with older residents over 60 with incomes in the "forgotten middle" range, those with incomes between 30% of Median Family Income and 100% of Median Family Income. (Note: These residents of these



ANC 6B Comments on Draft Comprehensive Plan, February 11, 2020 Tracking 19 of 24

Subject: Adoption of Capitol Hill Village Comments

Element: Community Services and Facilities

ANC Vote: 10-0-0

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households are not eligible for Medicaid nor eligible for public housing but cannot afford much service funded privately. Innovations, such as providing minimum health care in buildings with large numbers of older adults, can postpone the need for expensive long term care or bankruptcy by these households.)

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Economic Development Element

Capitol Hill Village (CHV) Comments

Capitol Hill Village (CHV) is very concerned about the projected shortfall of Home Healthcare Aides (HHA), the workforce that will care for the frail elderly, especially those seeking to age in place. CHV has conducted extensive research in this area that we can share with Office of Planning and other governmental agencies. In general, other than a suggested revision in the data presented in Table 7.2, we endorse the several updates to the Comprehensive Plan that would be of particular benefit to this workforce. We look forward to seeing what action the city might take to effect these aspirations.

1. NEW Figure 7.2 Cross-Cutting Industry Clusters Identified by the 2016 DC's Economic Strategy (certified as the Comprehensive Economic Development Strategy or CEDS by the U.S. Economic Development Administration in August 2017).

The Office of Planning should clarify implications of Table 7.2 for occupational as well as sector projections or supplement the table with occupation-specific projections.

Table 7-2 reports growth projections by industry sector; some of the reported sector categories are very broad (Professional, Scientific and Technical), others more narrowly focused (Home Health Care Services), making assessments of training programs and other growth-supporting initiatives difficult. In addition, categories overlap – in NAICS classifications, Ambulatory Healthcare Services, for example, includes home health services, yet in the D.C. data, Home Health Care Services are separately listed. While perhaps useful as an illustration of core sectors in the D.C. economy, data by occupation would be more useful for planning purposes.

Capitol Hill Village(CHV) has conducted extensive research into the projected shortfall in Home Healthcare Aides and Personal Care Aides (who help with basic activities of daily living for persons unable to live independently without support) which require the attention of the D.C. government. All of the by-occupation projections we have found place Home Healthcare workers in the top three (and usually the first) both nationally and in D.C. of projected needs occupations over the next decade. Capitol Hill Village analysts are very willing to share these data with the Office of Planning and other entities.

For example, District of Columbia projected job openings for Home Healthcare Aides and Personal Care Aides are as follows (DOES OLMRI data):

	2016	2026 (projected)	# change	%change
Home Health Care Aides	4,996	7,627	2631	52%
Personal Care Aides	6,012	8,563	2551	42%
TOTAL	11,008	16,190	5182	47%

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2. *716.8 CHV Endorses the retention of this policy with one OP proposed revision:*

716.8 Existing Policy ED-4.1.3 Certification and Associate Programs

Support the continued contributions of colleges and universities in providing career-building opportunities for District ~~adults~~ **residents**, including literacy and job training programs as well as professional certificate and two-year degree programs. The District will strongly support the University of the District of Columbia (UDC) as a public institution of higher learning, a place of continuing education, and a ladder to career advancement for District residents. 716.8

3. *716.9. CHV endorses the proposed revision to the policy on adult education as set forth below:*

716.9 Policy ED-4.1.4: Adult Education

Support adult education and workforce development, career and technical training for unskilled adult workers of all ages. Continue to innovate with programs that blend adult education and basic skills remediation with occupational skills and work - ~~Increase and more effectively target resources for adult education and workforce development, vocational training, and technical training for unskilled adult workers.~~ 716.9

4. *CHV endorses the following proposed new policy.*

NEW Policy ED-4.1.7 Interjurisdictional Professional Licensing Agreements

Encourage and support professional licensing boards/commissions to adopt interjurisdictional agreements that enable workers licensed in domestic jurisdictions other than the District of Columbia to reasonably obtain licensure to work in the District.

5. *CHV proposes a new Action Item as follows:*

Action ED-4.1.H Interjurisdictional Professional Licensing Agreement for Home Healthcare Aides.

The Department of Health licensing board for Home Healthcare Aides should pursue interjurisdictional agreements that would enable such workers licensed in other jurisdictions to reasonably obtain licensure to work in the District.

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6. *717.16 Capitol Hill Village endorses the proposed revision of the policy on Limited English Proficiency and Literacy.*

717.16 Policy ED-4.2.8: Limited English Proficiency and Literacy

Promote collaboration between the District's education, human services, juvenile justice, and workforce development agencies to better serve the city's English Language Learners (ELL) and Limited English Proficiency (LEP) populations, reduce barriers to employment, and connect residents with education and training opportunities, that lead to successful employment. Encourage English-as-a-Second-Language (ESL) programs and literacy training for residents in need of such services in order to overcome barriers to employment. ~~English-as-a-Second-Language (ESL) programs and literacy training for residents in need of such services in order to overcome barriers to employment.~~ 717.16

7. *CHV endorses the proposed new paragraph after 718.3 with the clarification that it is transit-accessible affordable housing that is imperative.*

NEW Transit-accessible affordable housing matching the needs of the workforce is imperative.

As Washington, DC continues growing, its housing **market is becoming more complex, characterized by increased segmentation of the market rate and affordable housing stock. As a consequence, this increased complexity necessitates closer alignment between economic development planning, housing planning and transportation planning to ensure that growth is equitable and sustainable.** **Planners should also recognize that housing needs to be transit-accessible for workers coming to the work location, as well as for the residents living there. For example, many homecare workers face transportation and parking challenges in accessing client homes. Older adults confront similar challenges in accessing health services. The creative design of large site developments, that are attentive to access issues for both workers and residents, and that include a mix of housing types and services, will help promote workforce development and quality of life.**

8. *Information derived from the following CHV proposed new action will help those who plan programs for developing the home healthcare aide workforce and providing these services.*

Action ED-4.3.E : Determine the number of homecare workers who travel to their work site via public transportation and by private vehicle. In addition, determine their average commute time.

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9. *Homecare Cooperatives offer a potentially viable business model for the Home Healthcare Aide workforce, one that has been shown to reduce turnover, improve wages and benefits, provide enhanced training and on-the-job supports, and develop leadership and career advancement opportunities. In this context, several of the proposed policies would facilitate the development of homecare cooperatives. CHV endorses the following:*

- **New Policy ED-3.2.8: Employee Owned and Controlled Businesses**
Support the creation and advancement of employee owned and controlled businesses. Consider techniques such as public funding to support the formation of cooperatives; prioritizing worker cooperatives in contracting and procurement opportunities; aligning preferences for cooperatives with workforce and economic development initiatives; training partnerships with workforce development programs; and providing technical assistance including financial and legal services.
- **New Policy ED 1.1.4: Promote Local Entrepreneurship**
Support District residents seeking entrepreneurship opportunities through layered programs including technical assistance, promotion of District products and services, and market development.
- **703.16 Action ED-1.1.C Business Support Structures.**
Streamline processes and create a more centralized system **that assists** ~~to assist~~ **businesses in meeting** ~~to meet~~ regulatory requirements quickly and efficiently, with a particular focus on serving small businesses, **businesses that show the promise to create many jobs, and businesses that help the District meet goals such as its commitments to reduce greenhouse gases. Continue** ~~Centralize~~ **centralizing** information and assistance to small and local businesses on starting a new business, the business permitting processes, zoning, fees and regulations, incentives, financing, unique programs, and opportunities. Create **and** maintain **a** fast-track permits and approvals system for businesses interested in opening or expanding in priority, under-served neighborhoods. 703.16
- **Endorse: Action ED-1.1.D Improve Access to Capital and Financing Opportunities**
Support collaboration between District agencies and private organizations that facilitate increased access to capital for District entrepreneurs. This includes strategic grantmaking, facilitating small business access to capital, and facilitating new forms of investment, such as social impact investing and Opportunity Funds.

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10. *Note: For the sake of completeness, we include below our comments on Workforce Development that Capitol Hill Village (CHV) is submitting to the Educational Facilities Element. The **text in bold underlined blue** represents CHV's proposed additions.*

NEW Policy EDU-3.2.3 Workforce Development

Strengthen connections among educational programs, skills training, and workforce development initiatives to support development of career pathways and prosperity for all.

Current Home Healthcare Aide (HHA) training opportunities for HHA certification are limited and often expensive in D.C. There is significant growth potential in the public school/community college sector for certification programs that train HHAs and facilitate bridging Certified Nursing Assistance (CNA) and HHA certifications.

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Educational Facilities Element

Capitol Hill Village (CHV) Comments

Capitol Hill Village (CHV) supports three of the new policies proposed by the Office of Planning and proposes a new "Action" needed for addressing critical workforce shortfalls.

1. *CHV endorses the new policy on University Offerings for Older persons but strongly recommends that the policy be amended to include "free" as well as "low cost access. We also suggest revising the "zip code" reference.*

NEW Policy EDU-3.2.6: University Offerings for Older Persons

Encourage universities to expand free and low-cost access to course and other university offerings to older persons who reside in Washington, DC, beyond zip codes that directly surround the university.

2. *CHV endorses without further revision OP's proposed:*

NEW Policy EDU-3.3.11: Access to Recreational, Educational, and Cultural Opportunities

Support continued access by local neighborhoods to university offerings, such as concerts and lectures, campus green space, continuing education, and low-cost programming for older persons.

3. *CHV endorses without further revision OP's proposed:*

NEW Policy EDU-3.2.3: Workforce Development

Strengthen connections among educational programs, skills training, and workforce development initiatives to support development of career pathways and prosperity for all.

4. *CHV proposes the addition of a new action that is critically needed to ensure adequately trained home healthcare aids in DC.*

NEW Action: EDU-3.2.3A: Addressing Home Healthcare Aide Workforce Development needs. Current Home Healthcare Aide (HHA) training opportunities for HHA certification are limited and often expensive in District. There is significant growth potential in the public school/community college sector for certification programs that train HHAs and facilitate bridging Certified Nursing Assistance (CNA) and HHA

Subject: Adoption of Capitol Hill Village Comments

Element: Education Facilities

ANC Vote: 10-0-0

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certifications. The HHA workforce draws significantly from immigrant populations with the corresponding need for cultural competency and language training.

Using DC Office of Labor Market Research and Information (DC OLMRI) workforce projections, forecast the size of new or additional public school or community college training programs for Home Healthcare Aides.

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Parks, Recreation and Open Spaces Element

Capitol Hill Village (CHV)

Capitol Hill Village is pleased that the Draft Comprehensive Plan recognizes the value and need for city parks and recreational programs for older citizens. Such programs are important for seniors who can become socially isolated which is detrimental to their overall health.

1. CHV endorses the following which includes significant new language:

- ***Policy PROS-2.2.56 Special Needs***

Increase efforts to meet the needs of special **underserved** population groups, particularly persons with disabilities. Provide "barrier free" access by modifying existing facilities to accommodate the needs of the **disabled and modifying existing indoor and outdoor facilities and parks to accommodate the needs of people with disabilities. Explore the use of alternative participation styles and formats in the program curriculum so that activities can be easily adjusted to allow people with disabilities to participate.** 810.9

- Need for improved data collection after 805.4:

NEW Improved data collection will allow the District and its partners to plan for a healthier and more active community. More robust data will help improve facilities usage and participation measurement, master planning, capital investment and programming decisions. The implementation of systems to track the work of DPR, such as maps to show progress in closing level of service gaps, as well as visitor data to observe trends in program participation, are important for prioritizing projects and improving community outcomes.

- ***Policy PROS-2.2.4 Data-Driven Programming***

Collect and analyze data on recreational program participation and use this data to shape decisions on future programs and operations. Programs should reflect local and national trends in recreation and regular surveys of District residents, with a focus on meeting the needs of underserved populations. 810.8

- ***NEW Action PROS 2.1.C: Parks Restroom Inventory***

Conduct an assessment of the existing parks restroom inventory, considering park size and usage to determine the needs for additional public restrooms.

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2. *CHV welcomes the revisions to the Policy PROS-2.2.3: Program Diversity. However, we are suggesting some edits to reflect the value of "Senior Villages." We also recommend a new "Action" entry to encourage the implementation of the policy.*

- *Policy PROS-2.2.3: Program Diversity*

Provide diverse recreational activities **to promote healthy living** for persons of all ages and cultural backgrounds, distributed equitably in all parts of the city. Coordinate **activities** with other service providers, including DC Public Schools, **and those sponsored by community-based organizations such as "Senior Villages*,"** to maximize the effectiveness of service delivery and minimize redundancy.

*** A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. Learn more about this nationwide movement at the Village to Village Network website: <https://www.vtvnetwork.org/>**

810.7

- **Action PROS-2.2L Enhancing effectiveness of programming for Older Adults. Work with Senior Villages and other non-governmental organizations to determine how community-based organizations can enhance the effectiveness of older adult recreational programs.**

3. *CHV recommends, by proposing this Action, the Parks Master Plan and other plans for individual parks include consideration of features designed for older adults.*

Action PROS-2.1F The Parks Master Plan and Master Plans for Individual Parks, as appropriate, should include the following for older adults

- **Recreation Center programming for older adults during the summer months.**
- **Indoor facilities to include walking tracks so older adults can continue their walking programs in rainy and cold weather.**



Subject: Adoption of Capitol Hill Village Comments

Element: Parks, Recreation and Open Space

ANC Vote: 10-0-0

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- **Benches be placed along side pedestrian paths every 1/8 of a mile.**

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Transportation Element

Capitol Hill Village (CHV) Comments

1. *Nomenclature. Capitol Hill Village, a neighborhood-based "senior village" with over 500 older adult members, endorses the substitution of "older adult" for "elderly" throughout the Element.*
2. *410.6 Policy T-2.4.2: Pedestrian Safety. Capitol Hill Village supports the policy that addresses pedestrian safety and endorses the proposed additions of additional types of pedestrian safety devices and approaches to 410.6 Policy T-2.4.2.*
3. *410.8 Policy T-2.4.4: Sidewalk Obstructions. CHV endorses this policy with the proposed change in nomenclature.*
4. *411.15. Action T-2.5.A: Maintenance Funds. CHV urges the city to improve sidewalk lighting in neighborhoods and to maintain sidewalks to reduce tripping hazards. This would make walking safer both from helping prevent injuries and increasing personal security. Specifically, we recommend revision of 411.15 as follows:*

411.15. Action T-2.5.A: Maintenance Funds.
Provide sufficient funding sources to maintain, and repair the District's system of **sidewalks**, streets and alleys, including its street lights and traffic control systems, bridges, street trees **and their roots**, and other streetscape improvements. 411.15
5. *After 410.14, CHV proposes a new action item as follows:*

NEW. Action T-2.4 G Pedestrian oriented street lighting.
Develop a program in coordination with the Metropolitan Police to prioritize improving pedestrian oriented lighting of sidewalks.
6. *After 420.11, NEW. Policy T-4.1.4: Accommodating Evacuation Needs. CHV very much endorses the addition of this new policy to ensure consideration of residents who have access and functional needs in emergency evacuation planning.*



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Subject: Adoption of Capitol Hill Village Comments

Element: Transportation

ANC Vote: 10-0-0

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Urban Design Element

Capitol Hill Village (CHV) Comments

More than perhaps other segments of society, older adults need to have safe sidewalks and walking trails with places to sit and rest. They also need access to safe and clean public restrooms. The effects of the Urban Design Element not only address the needs of DC's older citizens but also the needs and comfort of the hundreds of thousands of older tourists who come here each year.

1. *CHV endorses without change the following new proposed :*

- **NEW Action UD-2.1.B: Standards for Street Furniture**

Produce standards for street furniture in public space, such as benches, trash cans, and bike racks, that designate spacing, layout, and other characteristics that promote socialization and interaction, as well as public health and wellbeing.

- **New Action UD-2.1D Public Restrooms in Streetscapes**

When designing and upgrading streets and sidewalks in commercial areas, investigate opportunities to install attractive, clean, safe standalone public restrooms that are accessible at all hours.

2. *CHV endorses, with a proposed addition, the following new policy on neighborhood streetscapes:*

NEW Policy at UD-2.1.2: on Neighborhood Streetscapes Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low-scale buildings, while sidewalks with more trees and vegetation ~~My~~ **may** be appropriate for large-scale developments. **Pedestrian oriented lighting should be designed to enhance walking thoroughfares to public transportation hubs as well as visually reflect the character of neighborhood.**